

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiff,

v.

HARMAN INTERNATIONAL INDUSTRIES,
INCORPORATED,

Defendant.

Civil Action No. 05-10990-DPW

Magistrate Judge Judith G. Dein

HARMAN'S REPLY IN SUPPORT OF ITS MOTION TO COMPEL DISCOVERY

On July 7, 2006, in response to Harman's Motion to Compel (Docket Number 84) and more than three weeks after the close of fact discovery, MIT produced 128 documents, amended its privilege log to provide additional information as to numerous entries, and for the first time, claimed attorney-client privilege as to an additional twenty (20) documents for which it had previously claimed only work product protection. This supplemental production of documents and MIT's supplemental amendment of its privilege log, came despite MIT's May 8 assurance to Harman that it had "undertaken a full review of its privilege logs" and its June 12 representation to Harman that it had thoroughly reviewed its entries and the parties had reached an impasse. MIT's production and revised log demonstrate that Harman's Motion to Compel was necessary and proper to ensure that MIT produced responsive documents to which Harman is entitled. Harman attempted in good faith to resolve these privilege log issues, and, in fact, delayed the filing of its motion when MIT asked Harman to wait for further action pending its production of its June supplemental log and the parties' additional discussions thereafter. Harman should not

be penalized for meeting its obligations to meet and confer in good faith to resolve the issues before seeking the Court's assistance.

Most importantly, in its Opposition (Docket Number 90), MIT fails to address the substantive concerns raised by Harman throughout the meet and confer process and in the pending Motion to Compel. Specifically, MIT failed to demonstrate that the documents sought by Harman were created "in anticipation of litigation," failed to show that MIT and NEC had a common legal interest in the prosecution of the '685 patent, and produced many documents from its log with substantial redactions (listed on its new July 7 log as "non-responsive") while assuring the Court that it was removing other documents previously withheld as "non-responsive." *See, e.g.*, Exhibit A (to be filed separately under seal); *see also* MIT's July 7, 2006 Revised Privilege Log (attached herein as Exhibit F).

Pursuant to this Court's July 17, 2006 Order granting Harman's Motion to File a Reply in Support of its Motion to Compel, Harman hereby respectfully submits this reply.

I. More Than Two Months After The Parties First Met and Conferred on this Issue, MIT Untimely Volunteers to Produce Documents, Removes Documents From Its Log, and Asserts New Claims of Privilege.

In its Opposition, MIT states that "[i]n responding to Harman's motion, MIT has carefully reviewed the withheld documents and in the interest of simplifying the issues presented, MIT is removing a number of the documents Harman has requested." MIT, however, should have performed such a "careful review" *prior to* the close of fact discovery, as well as in response to Harman's dispute of MIT's privilege claims. Furthermore, the documents produced on July 7 do not resolve Harman's concerns, as many of these documents for which MIT has now dropped its claim of work product protection have now been largely redacted on the basis

that the information is “non-responsive.”¹ Furthermore, MIT has removed entire entries from its log in response to Harman’s motion, but has not produced them, claiming only now that they are non-responsive. Accordingly, Harman respectfully requests the court to order MIT to produce these documents.

Moreover, MIT, also for the first time, asserts attorney client privilege over 20 documents because it “inadvertently failed to add the basis of withholding including attorney-client privilege.” Opposition at 5. MIT’s failure to review and properly designate these 20 documents as protected under attorney-client privilege until *after* Harman filed its Motion to Compel further demonstrates the compelling need for Harman’s motion. Because MIT failed to assert this privilege at any point during the two months and multiple revisions of its log, Harman respectfully requests that this Court deny MIT’s efforts to assert attorney client privilege at this late juncture.

II. MIT Has Not Met Its Burden Of Proving That The Licensing Documents It Withholds Are Protected Work Product

Harman’s motion to compel seeks documents for which MIT has not met its burden in claiming work product protection.² MIT’s claim that it “has not argued that all of its licensing-related documents were *per se* created in anticipation of litigation” is belied by the fact that many of the entries Harman disputes are described only generically as prepared in anticipation of litigation “in the context of licensing negotiations” and that MIT has consistently refused to provide any additional basis for its claim. *See* Motion to Compel at 3. Furthermore, MIT’s July

¹ Harman notes that MIT makes no mention of these redactions in its representation to the Court that these documents would be produced. *See* Opposition at 2, n. 1.

² MIT attempts to divert this Court’s attention to irrelevant issues including, for example, whether Harman’s counsel anticipated litigation. Whether Harman anticipated litigation is not at issue in this motion. Instead, the issue is whether MIT has met its burden to demonstrate that the documents in question – *those authored by MIT or its representatives* – were prepared in anticipation of litigation.

7 supplemental production of documents, indicating that MIT has now dropped its privilege claims, includes many documents with prior descriptions that mirror those of documents still remaining on its log. Such a blanket description is insufficient to support a claim of privilege.³

Instead of listing such blanket descriptions, “[a] party seeking to assert that materials were prepared in anticipation of litigation must state with some specificity which litigation was anticipated, and what nexus exists between the anticipated litigation and the contents of the materials in question or the motivation for their creation.” *In re Grand Jury Subpoena*, 220 F.R.D. 130, 146 (D. Mass. 2004). Documents are not considered “prepared in anticipation of litigation” where litigation was threatened primarily to coerce the development of a licensing relationship. *Minebea Co., Ltd. v. Papst*, 229 F.R.D. 1, 4 (D.D.C. 2005).

MIT first argues that documents created in the course of its assertion of the patent against Harman are “classic work product.” MIT, however, fails to demonstrate factually that each of these documents was prepared “in anticipation of litigation.” If such documents were prepared in the context of license negotiations with Harman, and not “in anticipation of litigation,” the fact that litigation eventually arose does not change the unprotected nature of these documents. To continue to withhold these documents, MIT must show that the documents were prepared “in anticipation of litigation,” and MIT has not done so.⁴

³ For example, Entry Nos. 300-310 produced by MIT in its Opposition were described as “E-mail internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations.” This exact same description serves as the basis for MIT’s continued withholding of certain documents including but not limited to Entry Nos. 246, 248, 249, 273 and 274.

⁴ As an example, MIT claims in its Opposition that Entry No. 465 is a document created during the course of its patent assertion against Harman, and describes the document as authored by Robert Swartz and “containing his impressions relating to patent infringement.” Mr. Swartz was engaged by MIT “to *commercialize* several MIT-owned patents ... [f]rom 2003 through March of 2005 ... engaged in *license negotiations* with Harman.” See Decl. of Jack Turner at 2 (emphasis added) (filed herein as Exhibit B). Mr. Swartz’s employment contract with MIT only provides for his services in the licensing context and he is compensated on this basis; nowhere does his contract contemplate his potential legal services or legal advising to MIT regarding the infringement of its patents. See Exhibit K to Harman’s Motion to Compel (Docket Entry 84) (filed under seal). Neither the

As to documents created during negotiations with third parties, MIT has similarly failed to demonstrate that the documents were created in anticipation of litigation. In fact, information provided in MIT's Opposition clearly demonstrates that certain of the discussed documents were not prepared in anticipation of litigation. For example, in its Opposition, MIT identifies the third parties involved in the various negotiations for which the documents were created. Included within that list are documents created during the license negotiations with GoThere. MIT provides no explanation as to how documents relating to license negotiations with GoThere could have been created "in anticipation of litigation." GoThere was an equity-based start-up company, involving both Jack Turner (of MIT's Technology Licensing Office) and Christopher Schmandt (one of the inventors of the patent at issue). GoThere never made any products and thus could not be accused of infringing MIT's patents. MIT has not demonstrated a "subjective belief that litigation was a real possibility" and makes no attempt to explain how such documents anticipated litigation.⁵ *In re Grand Jury Subpoena*, 220 F.R.D. at 147. MIT would apparently have this Court believe that MIT was truly anticipating suing its own professor and its own inventors' start-up company. This is not credible.

description of Entry No. 465, nor that in MIT's revised privilege log issued on July 7 (providing no date, listing no recipients, and described as "[h]andwritten document prepared in anticipation of litigation in the context of license negotiations") provides any information to show that the document was in anticipation of litigation.

⁵ As another example, MIT lists the following documents as relating to Zexel, a potential licensee: Entry Nos. "168, 169, 170, 227, 231, 243-258, 259, 261, 265, 268, 272, 273, 274, 330 540." But MIT only attempts to demonstrate that three of these documents were created in anticipation of litigation. The remaining documents are described broadly and without specificity: "...these documents all relate to MIT's interest in licensing its patent to Zexel, and thus relate to licensing and enforcement strategies in that regard." Opposition at 8. Thus, MIT apparently again relies upon an underlying premise that licensing negotiations are *per se* in anticipation of litigation, a claim MIT has admitted is improper through its production of other such documents. See Opposition at 4 (noting that "it has produced a number of them.").

MIT appears, once again, to confuse the different types of privilege, providing the following explanation for its claim of work product protection: "relating to licensing strategy and reflecting legal advice previously provided" ... and "relate to license strategy and reflect legal advice previously provided." See Opposition at 9.

MIT next argues (but cites no legal support) that “only what was ultimately offered to third parties in the licensing context. . . could be relevant, at all, to the issue of royalty.” Opposition at 8. MIT provides the following explanation as to why these documents are not relevant: “They relate to MIT’s views as to the strategy and compromises that should be made in licensing and litigating its patents.” Opposition at 8. In so saying, MIT has precisely established the relevance of these documents. Documents relating to MIT’s views as to licensing strategy and compromises made therein are relevant to Harman’s reasonable royalty analysis under *Georgia Pacific*, which identifies a patentee’s licensing practices as one of the pertinent factors considered by courts in determining reasonable royalty under a hypothetical negotiation. See *Brunswick Corp. v. United States*, 36 Fed. Cl. 204, 211 (Ct. Cl. 1996) (citing *Georgia Pacific Corp. v. United States Plywood Corp.*, 318 F. Supp. 1116, 1120 (S.D.N.Y. 1970)). Moreover, MIT did not withhold these documents on relevance grounds, only privilege. MIT’s new-found relevance argument should be disregarded, as relevancy is an issue for trial, not discovery.

Finally, MIT argues that “to obtain work-product documents, Harman must convince this Court that it has a substantial need for the materials and is unable to obtain a substantial equivalent by other means.” Opposition at 3. However, this represents an improper effort to shift the burden of proof to Harman. The burden first rests with MIT to prove that the documents are properly protected work-product. Since the documents sought are not work product, Harman need not make any such showing.

III. MIT’s Incorrectly Claims that Harman is Withholding Similar Documents.

Once again, MIT raises new issues in its Opposition without having first met and conferred with Harman as required by the Federal and Local Rules. In doing so, MIT misstates both the facts and the law in arguing that Harman is “withholding dozens of the same types of documents it seeks by its motion.” Opposition at 9. The documents sought by Harman relate to

license negotiations for which Harman disputes MIT's claim of *work product* protection. On the other hand, the documents now sought by MIT are those withheld by Harman as *attorney-client communications*, and were so logged. MIT's argument that "[a]pparently, Harman contends that if its licensing agent is an attorney, all the documents become privileged" fails to comprehend that such documents – seeking, rendering or reflecting the legal advice of an attorney – are privileged as *attorney-client* communications. Furthermore, MIT's reliance on Rule 26(b)(3), which deals with work product protection, does not affect Harman's proper claim of attorney-client privilege. *See In re the Regents of the University of California*, 101 F.3d 1386, 1390 (Fed. Cir. 1996) ("It is well established that the attorney-client privilege is not limited to actions taken and advice obtained in the shadow of litigation.").⁶ The fact is, documents "seeking, rendering or reflecting the legal advice of an attorney" are protected as attorney-client communications, even if such legal advice occurred during licensing negotiations.

IV. Documents Shared By MIT With NEC Are Not Protected By The Common Interest Doctrine.

Harman's motion further seeks to compel documents that MIT shared with NEC, the sponsor of James Davis' thesis work, because MIT waived the attorney-client privilege by sharing the communications with NEC, a third party. *See United States v. Massachusetts Inst. of Tech.*, 129 F.3d 681, 684 (1st Cir. 1997) (attorney-client privilege is waived by voluntary disclosure of private communications to a third party).

MIT argues that it shared a common interest with NEC, and thus communications shared with NEC remain privileged, but MIT fails to meet its burden to demonstrate that a common

⁶ MIT's argument that "[i]f Harman's in-house licensing agents, Hart and Peracchio, happen to be lawyers, it doesn't mean that their business related documents suddenly obtain some higher level of protection" also fails to support its claim that Harman is withholding similar documents as these documents were identified as attorney-client privileged and reflect legal advice sought or rendered.

legal interest existed. MIT has not shown that NEC was represented by the same attorney as MIT during the prosecution of the patent at issue or that MIT and NEC were somehow joint clients during the patent prosecution. *See In re Regents of the Univ. of California*, 101 F.3d at 1389 (citing *Simpson v. Motorists Mutual Ins. Co.*, 494 F.2d 850, 855 (7th Cir. 1974) (“When the same attorney represents the interests of two or more entities on the same matter, those represented are view as joint clients for purposes of privilege.”). Nor has MIT shown that the documents sought are communications between NEC and MIT for the purposes of obtaining legal advice. *See In re Columbia*, 293 F.3d 289, 294 (6th Cir. 2002) (stating that the attorney-client privilege “applies only where necessary to achieve its purpose and protects only those communications necessary to obtain legal advice”).

Documents recently produced by MIT in response to Harman’s motion further demonstrate that NEC played no role in the original filing of the patent application and in fact sought to license the Back Seat Driver solely for the opportunity to commercialize. *See* Exhibit C (to be filed separately under seal). (This document, created months after the patent application was filed, follows a meeting between NEC’s Phil Rittmueller and the inventors, and reflects NEC’s decision at that time to proceed with the commercialization of the invention, requests information as to where MIT stood in the patent application process, and confirms that NEC would seek a license.)

Although MIT argues that NEC was “more than a typical non-exclusive licensee” and had “more than a bare nonexclusive license,” it has shown only that MIT and NEC potentially shared a commercial interest, not an identical legal interest. The fact that NEC, as a sponsor had the opportunity to obtain a non-exclusive license did not (and MIT has not demonstrated that it did) create an identical legal interest. Courts generally require that the interest be “an identical

legal interest *as opposed to a solely commercial interest.*” *MPT, Inc. v. Marathon Labels, Inc.*, No. 1:04 CV 2357, 2006 WL 314435, at *6 (N.D. Ohio Feb. 9, 2006) (emphasis added) (citing *In re Regents of the Univ. of California*, 101 F.3d 1386, 1390 (Fed. Cir. 1996)).⁷ Even if both NEC, and MIT had a commercial interest in the successful issue of the patent (because NEC sought to obtain a non-exclusive license to the Back Seat Driver and to manufacture products under that license) that interest was different, not identical. A non-exclusive licensee, by definition, does not have identical legal interests to the patentee, because the non-exclusive licensee lacks certain property rights including, for example, the right to exclude. NEC’s sponsorship and non-exclusive license therefore created a *different* and purely *commercial* interest in the patent. This difference was recognized by the Federal Circuit, which held in *In re Regents of California* that “a patentee and a nonexclusive licensee do not share identical legal interests.” *See In re Regents of California*, 101 F.3d at 1390.

Furthermore, even though NEC sponsored the research for the Back Seat Driver, NEC as well as *all other* sponsors of MIT’s Media Lab have a right to license not just the patent at issue, but *any* patent which is conceived and reduced to practice by the Media Lab during such sponsorship. *See* MIT Media Lab Sponsors Website, *available at* <http://www.media.mit.edu/sponsors/ip/html> (attached herein as Exhibit D). Indeed, on its website, the Media Lab touts its “**intellectually open environment** . . . in which each sponsor is entitled to acquire non-exclusive licensing rights to all intellectual property that is conceived, developed, or reduced to practice.” *See id.* (emphasis in original). The research agreement

⁷ *See also Oak Indus. v. Zenith Indus.*, No. 86 C 4302, 1988 WL 79614, at *4 (N.D. Ill. July 27, 1988) (“The key consideration is that the nature of the interest must be identical, not similar, and be legal, **not solely commercial**” (emphasis added)) (citing *Duplan v. Deering Milliken*, 397 F. Supp. 1146, 1172 (D.C.C. 1975)); *United States v. BDO Siedman, LLP*, 368 F. Supp. 2d 858, 861 (N.D. Ill. 2005) (noting that the common interest doctrine applies “where the information protected from disclosure has been shared with a third party that is involved in a joint defense effort or strategy. Furthermore, the asserted common interest must be legal and not merely commercial or financial.”).

between MIT and NEC also reflects this “intellectually open environment,” as the agreement gives NEC the right to a non-exclusive license to *any* Media Lab invention that is conceived or reduced to practice during NEC’s sponsorship, and not just the Back Seat Driver. *See* NEC Research Agreement at ¶ 8(B) (filed under seal as Exhibit R to Harman’s Motion to Compel (Docket Number 84)).

This standard provision in MIT’s sponsorship agreements demonstrates the absence of an exclusive licensing relationship with NEC because NEC, as well as all other of the dozens of Media Lab sponsors, are entitled to the royalty-free non-exclusive license of any Media Lab invention. Should this Court decide to find an identical legal interest here, such a finding would broadly entitle MIT to claim an “identical legal interest” with *all* of its Media Lab sponsors at *any* time during their sponsorship of *any* Media Lab patent. Such a broad finding would be contrary to the well-established rule that privilege must be narrowly construed. *See, e.g., In re Grand Jury Proceedings October 12, 1995*, 78 F.3d 251, 254 (6th Cir. 1996) (“Because the privilege reduces the amount of discoverable information during the course of a lawsuit, it must be narrowly construed.”). NEC’s interest in the Back Seat Driver was different from MIT’s, similar to other sponsors, and was purely commercial in nature. As such, MIT cannot claim – and has failed to show – an identical legal interest with NEC, and has thus waived its privileged communications by disclosing them to NEC, a third party having no identical legal interests.

V. MIT’s Failure To Previously Produce Documents Improperly Withheld As Privileged Prejudices Harman.

Finally, MIT questions whether its withholding of these documents actually prejudices Harman in the preparation of its case. MIT’s improper withholding of documents regarding licensing with third-parties relates directly to Harman’s ability to assess reasonable royalties in its defense against MIT’s damages claims. Furthermore, by way of example, MIT’s recent

production includes a statement by Jack Turner regarding the interpretation of claims,⁸ *see* Exhibit E (to be filed under seal), as well as documents concerning a royalty free license to the Back Seat Driver, *see* Exhibit A (to be filed under seal).⁹ Such documents are clearly related to claim construction and reasonably royalty analysis and are responsive to Harman's document requests.

Harman respectfully requests the assistance of this Court in compelling MIT to produce documents for which it has not demonstrated privilege or work product protection.

⁸ Harman is unable at this late date, five months after Mr. Turner's deposition, to question him in this regard.

⁹ Unfortunately, the one line that is present indicates a discussion of a royalty free license, but the surrounding text has been redacted as "non-responsive."

Dated: July 21, 2006

Respectfully submitted,

/s/ Craig D. Leavell

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **HARMAN'S REPLY IN SUPPORT OF ITS MOTION TO COMPEL DISCOVERY** was sent by electronic-mail this 21st day of July, 2006, addressed to counsel for MIT as follows:

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/s/ Ann H. Chen
One of the Attorneys for Harman

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

HARMAN INTERNATIONAL INDUSTRIES,
INCORPORATED,

Plaintiff,

v.

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Defendant.

Case No. 1:05-CV-01481

**DECLARATION OF JOHN H. TURNER, JR. FILED IN SUPPORT OF
DEFENDANT MASSACHUSETTS INSTITUTE OF TECHNOLOGY'S
MOTION TO DISMISS, OR IN THE ALTERNATIVE TRANSFER,
PLAINTIFF HARMAN INTERNATIONAL INDUSTRIES' COMPLAINT**

I, John H. Turner, Jr., state:

1. I am Associate Director of the Technology Licensing Office of the Massachusetts Institute of Technology ("MIT").

2. I am familiar with the facts of the above-captioned case, and submit this declaration as support for MIT's Motion To Dismiss, Or In The Alternative Transfer, Plaintiff Harman International Industries' Complaint.

3. Defendant MIT is a non-profit educational and research institution organized under the corporate laws of the Commonwealth of Massachusetts with a principal place of administration in Cambridge, Massachusetts.

4. MIT employs approximately 12,500 employees who work at MIT's facilities in Cambridge and Lexington, Massachusetts. Over 10,000 students currently attend MIT at its Cambridge, Massachusetts campus. All of MIT's senior management and executives work in MIT's facilities in Massachusetts. All licensing of MIT's patent rights is controlled and supervised by MIT's employees in Massachusetts. MIT's counsel is located in Boston.

5. As a non-profit educational organization, litigation expenses are a significant issue for MIT, and the burden of litigating in a foreign forum such as the Northern District of Illinois would be extremely onerous and costly.

6. MIT is the exclusive owner of U.S. Patent No. 5,177,685, entitled "Automobile Navigation System Using Real Time Spoken Driving Instructions," which issued on January 5, 1993 (the "'685 patent"). The two inventors listed on the face of the '685 patent, James R. Davis and Christopher M. Schmandt, assigned all rights, title and interest in the patent to MIT. On information and belief, Mr. Schmandt currently resides in Massachusetts, and Mr. Davis currently resides in Canada.

7. Robert Swartz, an independent contractor, has been working to commercialize several MIT-owned patents, including the '685 patent, for the past several years.

8. From 2003 through March of 2005, Mr. Swartz and others at MIT were engaged in license negotiations with Harman.

9. On information and belief, neither Mr. Swartz nor any other person on behalf of MIT ever threatened litigation, or expressed to Harman that MIT was planning to sue Harman at any time during the approximately two years of license negotiations.

10. On the morning of March 14, 2005, Harman executives and counsel traveled to Cambridge, Massachusetts, to meet with MIT executives including myself on behalf of the Technology Licensing Office. Among those attending the meeting on MIT's behalf, in addition to myself, were Mr. Swartz, Robert Fadel (Director of Finance for the MIT Media Laboratory), Walter Bender (Executive Director and Senior Research Scientist for the MIT Media Laboratory), and Thomas Sadtler (Associate Director at the MIT Media Laboratory). Among those attending the meeting on Harman's behalf were Edwin C. Summers (Vice President and General Counsel for Harman), Robert P. Hart (Chief Intellectual Property Counsel for Harman), Dr. Tim Bast (European IP Counsel for Harman), John Peracchio (Senior Vice President, Business Administration & Legal Affairs of Harman/Becker Automotive Systems (a Harman subsidiary)), Kevin L. Brown (Senior Vice President and Chief Financial Officer of Harman/Becker Automotive Systems (a Harman subsidiary)), and Meredith Martin Addy, Esq. (Intellectual Property Attorney of the law firm Brinks Hofer Gilson & Lione, counsel for Harman). The purpose of this meeting was to continue the ongoing license negotiations. At no time during the meeting did MIT threaten to file suit against Harman. At no time during the meeting did any Harman representative mention anything about filing a lawsuit against MIT. At the close of that meeting, Harman executives shook hands with the MIT representatives present, and expressed that Harman would get back to MIT about discussing the potential for taking a license to MIT's '685 patent "within a week or two."

11. Rather than continuing the negotiations as it had stated it would, Harman filed the current declaratory judgment action on the very same March 14, 2005 morning it was meeting with MIT.

12. On May 12, 2005, MIT filed suit against Harman in the United States District Court for the District of Massachusetts, alleging that certain Harman products infringe the '685 patent.

I declare under the penalty of perjury that the foregoing is true and accurate and that this Declaration was executed on May 13, 2005.

John H. Turner, Jr.
Associate Director
Technology Licensing Office
Massachusetts Institute of Technology

EXHIBIT D



MIT Media Lab

- sponsorship overview
- getting value from sponsorship
- intellectual property & patents
- current sponsor list
- spin-offs
- fellows
- sponsor collaborations
- sponsors only: insite

about us • academics • **SPONSORS** • research • publications • events • people • contact us

Intellectual Property and United States Patents

The Media Laboratory is unique among laboratories, centers, and research programs at MIT in that full sponsors of the Laboratory have the opportunity to share in all of its intellectual property, license-free and royalty-free. Non-sponsors are precluded from making use of the Laboratory's developments for at least two years after technical disclosure is made to MIT and Media Lab sponsors.

As a result, the Laboratory is an **intellectually open environment** where ideas are readily exchanged, and is a community in which each sponsor is entitled to acquire non-exclusive licensing rights to all intellectual property that is conceived, developed, or reduced to practice. Over the years, this policy has fostered a large number of unexpected and highly successful solutions that have led to new technologies and products, greatly benefiting both sponsors and the world community.



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EXHIBIT F

MASSACHUSETTS INSTITUTE OF TECHNOLOGY v. HARMAN INTERNATIONAL INDUSTRIES, INC.
 United States District Court, District of Massachusetts
 Civil Action No. 05-10990 DPW

July 7, 2006

PRIVILEGE LOG OF PLAINTIFF MASSACHUSETTS INSTITUTE OF TECHNOLOGY

Please Note: This is a log identifying all documents withheld from the document productions to date in the above-captioned litigation. We expressly incorporate herein and continue to maintain all assertions of the attorney-client privilege, attorney work-product doctrine, or any other applicable privilege.

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
1.	02/25/92	John J. Hynes	B. Jean Weidemier, Esq.		Attorney-client communication reflecting request for legal advice re: patent prosecution	AC	1
2.	10/02/91	B. Jean Weidemier, Esq.	Sam Pasternack, Esq.	Penny Blaisdell; Diane Gaylor; Robert Greene; John Hynes; John Preston; Philip Rittmueller	Attorney-client communication reflecting provision of legal advice in the course of prosecution of US Patent 5,177,685	AC	1
3.	08/23/91	Nicholas Negroponte	John Preston	John Hynes; Robert Greene	Letter and memorandum internal to MIT personnel prepared in anticipation of litigation re: license negotiations; (reflecting legal advice previously provided in the context of patent prosecution)	AC/WP	5
4.	07/15/91	B. Jean Weidemier, Esq.	John Hynes	Irene Abrams	Memorandum reflecting provision of legal advice re: license agreement and negotiations	AC/WP	1

AC = Attorney-Client Privileged
 WP = Work Product Protected
 NR = Non-Responsive

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
5.	07/26	Secretary for Irene Abrams	Irene Abrams		MIT internal communication reflecting request for legal advice in the course of patent prosecution	AC	1
6.	07/10/91	Philip Rittmueller	B. Jean Weidemier, Esq.	Gerry Kenney, Esq.; Guy Shoup, Esq.	Document containing confidential communication reflecting request for legal advice with privileged handwritten notations regarding foreign patent application rights	AC	2
7.	05/24/91	B. Jean Weidemier, Esq.	Philip Rittmueller	John Hynes; Robert Greene	Document with handwritten notations containing confidential communication reflecting legal advice in response to request for legal advice prepared in the course of prosecution of US Patent 5,177,685; produced in redacted form as Bates nos. MIT 06572-06577	AC/WP	2
8.	03/27/91	B. Jean Weidemier, Esq.			Document with handwritten notations reflecting response to request for legal advice regarding license negotiations prepared in anticipation of litigation; produced in redacted form as Bates nos. MIT 06578-06579	AC/WP	2

AC = Attorney-Client Privileged
WP = Work Product Protected
NR = Non-Responsive

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
9.	02/11/91	B. Jean Weidemier, Esq.			Memo to file re: patent prosecution and license agreement terms reflecting attorney strategy in response to request for legal advice	AC/WP	2
10.	11/28/90	B. Jean Weidemier, Esq.			Attorney privileged handwritten notations and attorney working draft reflecting legal advice concerning license negotiations prepared in anticipation of litigation; produced in redacted form as Bates nos. MIT 06580-06583	WP	4
11.					Produced in its entirety as Bates no. MIT 06584-05687		
12.					Produced in its entirety as Bates no. MIT 05557		
13.					Produced in its entirety as Bates no. MIT 05558		
14.					Produced in its entirety as Bates no. MIT 05559-05559A		
15.	07/29/92	Secretary for John Hynes	John Hynes		Internal MIT memorandum reflecting substance of communication with MIT's counsel	AC	1

AC = Attorney-Client Privileged
WP = Work Product Protected
NR = Non-Responsive

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
16.	03/18/05	Karin Rivard, Esq.	Jack Turner; Robert Swartz; Tom Sadtler; Walter Bender	Lita Nelsen; Alice P. Gast	Emails and communications re: Harman lawsuit against MIT reflecting provision of legal advice and attorney strategy in anticipation of litigation (remainder of documents previously logged as Entry No. 16 now logged as Entry Nos. 760-765).	AC/WP	3
17.	08/06/91	John Hynes	Robert Greene		Email internal to MIT personnel and handwritten document prepared in anticipation of litigation in the context of license negotiations; (email with handwritten annotations reflecting legal advice previously provided)	AC/WP	2
18.	04/27/92	Sam Pasternack, Esq.	John Hynes		Attorney-client communication re: office action response reflecting provision of legal advice and attorney strategy	AC/WP	10
19.	09/03/91	John T. Preston	Nicholas Negroponte		Internal MIT memorandum reflecting substance of communication with MIT's counsel regarding patent prosecution	AC	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
20.	08/30/91	B. Jean Weidemier, Esq.	John Hynes		Internal MIT memorandum reflecting provision of legal advice re: patent prosecution, communications with outside counsel and attorney strategy	AC/WP	2
21.	05/24/91	B. Jean Weidemier, Esq.	Philip Rittmueller	John Hynes; Robert Greene	Attorney-client communications reflecting legal advice in the course of prosecution of US Patent 5,177,685; produced in redacted form as Bates no. MIT 06588	AC	1
22.	09/10/91	Robert Greene	John Hynes	Penny Blaisdell; Rebecca Prendergast	Correspondence reflecting substance of communication with MIT's counsel regarding patent prosecution	AC	1
23.	10/02/91	B. Jean Weidemier, Esq.	Sam Pasternack, Esq.	Penny Blaisdell; Diane Gaylor; Robert Greene; John Hynes; John Preston; Philip Rittmueller	Attorney-client communication reflecting provision of legal advice in the course of prosecution of US Patent 5,177,685	AC	1
24.	03/02/92	John Hynes	Nicholas Negroponite	John Hynes; Rebecca Prendergast; Susan A. Browne; Penny Blaisdell; Robert Greene	Internal MIT email reflecting substance of communication with MIT's counsel regarding patent prosecution	AC	2

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
25.	11/27//	Secretary to John Preston	John Preston		Internal MIT memorandum/handwritten notations reflecting communication with MIT's counsel regarding patent prosecution and attaching attorney-client correspondence regarding same	AC	4
26.	08/28/89	B. Jean Weidemier, Esq.	Robert Greene		Internal MIT attorney-client communication reflecting provision of legal advice concerning patent prosecution	AC/WP	1
27.	11/28/90	B. Jean Weidemier, Esq.	H. Hoshino	Philip Rittmueller; John Hynes	Communications with attorney; handwritten notations reflecting provision of legal advice regarding license negotiations prepared in anticipation of litigation; Produced in redacted form as Bates nos. MIT 06589-06595	AC/WP	7
28.	11/30/90	John Hynes	B. Jean Weidemier, Esq.		Handwritten notations re: attorney-client communications concerning patent prosecution and license negotiations and reflecting request for legal advice	AC/WP	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
29.	11/28/90	B. Jean Weidemier, Esq.	H. Hoshino	Philip Rittmueller; John Hynes	Communications with attorney; handwritten notations reflecting provision of legal advice regarding license negotiations prepared in anticipation of litigation; Produced in redacted form as Bates nos. MIT 06596-06599	AC/WP	4
30.	02/06/91	John Hynes	B. Jean Weidemier, Esq.		Internal MIT email reflecting request for legal advice re: patent prosecution and license negotiations	AC/WP	1
31.	02/06/91	John Hynes	B. Jean Weidemier, Esq.		Internal MIT communications reflecting request for legal advice re: patent prosecution	AC	2
32.	02/11/91	John Hynes			Handwritten notes of conversation with counsel re: license agreement terms and patent prosecution reflecting request for and provision of legal advice in anticipation of litigation	WP	4
33.	08/06/91	Robert Greene	John Hynes	Nicholas Negroponte; Robert Greene	Internal MIT e-mail containing a confidential communication referring to legal advice previously provided regarding patent prosecution	AC	3

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
34.					Produced in its entirety as Bates nos. MIT 06600-06601		
35.					Removed from the log as duplicative of Entry No. 39.		
36.	07/10/91	Philip Rittmueller	B. Jean Weidemier, Esq.	Gerry Kenney, Esq.; Guy Shoup, Esq.	Attorney client communications reflecting request for legal advice with privileged handwritten notations regarding foreign patent application rights	AC	2
37.	07/05/89	James R. Davis; Christopher M. Schmandt			Documentation concerning patent prosecution prepared at the direction of MIT's counsel	AC	14
38.	03/04/92	Rebecca Prendergast	Irene Abrams	Rebecca Prendergast	MIT internal communications regarding documentation prepared at the direction of and reflecting communication with MIT's counsel concerning patent prosecution	AC	6
39.	05/24/91	B. Jean Weidemier, Esq.	Philip Rittmueller	John Hynes; Robert Greene	Attorney-client communications reflecting provision of legal advice in the course of prosecution of US Patent 5,177,685. Produced in redacted form as Bates No. MIT 06602.	AC	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
40.	08/16/91	Philip Rittmueller	Nicholas Negroponite; Robert Greene		Memorandum with handwritten notations reflecting communication with MIT's counsel regarding patent prosecution	AC	3
41.	10/02/91	B. Jean Weidemier, Esq.	Sam Pasternack, Esq.	Penny Blaisdell; Diane Gaylor; Robert Greene; John Hynes; John Preston; Philip Rittmueller	Attorney-client communications reflecting provision of legal advice regarding patent prosecution	AC	2
42.	04/23/92	MIT Personnel			Handwritten notes re: conversations with counsel reflecting legal advice regarding patent prosecution	AC	1
43.	02/25/91	B. Jean Weidemier, Esq.	Sam Pasternack, Esq.		Attorney-client correspondence reflecting provision of legal advice regarding patent prosecution	AC	1
44.	02/20/92	John Hynes	Philip Rittmueller		Correspondence reflecting legal advice previously given by MIT's counsel re: patent prosecution	AC	1
45.	03/24/92	Secretary to John Hynes	John Hynes		Communication with MIT's counsel and attaching memorandum to in-house counsel reflecting provision of legal advice concerning patent prosecution	AC	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
46.	03/02/92	John Hynes	Nicholas Negroponite	John Hynes; Rebecca Prendergast; Susan Browne; Penny Blaisdell; Robert Greene	Handwritten notation and internal MIT e-mail reflecting communication with MIT's counsel re: patent prosecution	AC	4
47.	04/21/	Secretary for Nicholas Negroponite	Nicholas Negroponite		Handwritten notations reflecting provision of legal advice previously give by counsel re: patent prosecution	AC	3
48.	02/06/91	John Hynes	B. Jean Weidemier, Esq.	jho@media-lab.media.mit.edu	Internal MIT communications and handwritten notations reflecting request for legal advice re: patent prosecution	AC	3
49.	06/28/91	Susan Browne	John Hynes		Internal MIT memorandum reflecting communication with MIT's counsel re: patent prosecution	AC	
50.	12/16/94	Steven J. Frank, Esq.	Robert Greene		Attorney-client communication reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation	AC/WP	5
51.		John J. Hynes			Handwritten notations reflecting legal advice provided by MIT's counsel re: patent prosecution	AC	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
52.	06/24/96	Bob Bloomberg	Jack Turner; Nikki J. Borman	lynn@media; lauren; jamesb@media	Internal MIT communications re: documents prepared at the direction of counsel concerning patent prosecution	AC	2
53.	02/20/92	John Hynes	B. Jean Weidemier, Esq.		Attorney-client communications and handwritten notations reflecting provision of legal advice and communications with MIT's outside counsel re: patent prosecution	AC	7
54.	02/10/92	Diane Gaylor	B. Jean Weidemier, Esq.	Nikki Borman; John Hynes	Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	12
55.	07/08/92	Sam Pasternack, Esq.	B. Jean Weidemier, Esq.	Philip Rittmueller; Brian D. Ogonowsky, Esq.	Attorney client communications reflecting provision of legal advice regarding patent prosecution	AC	2
56.					Produced in its entirety as Bates No. MIT 06845-06846		
57.	12/09/94	Robert Greene	Steven J. Frank, Esq.		Attorney-client correspondence requesting legal advice concerning licensing in anticipation of litigation	AC	2

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
58.	03/30/05	Karin Rivard, Esq.			Attorney handwritten notes re: Harman lawsuit against MIT and communications with outside counsel reflecting provision of legal advice and attorney strategy in anticipation of litigation	AC/WP	14
59.	3/24/03	Karin Rivard, Esq.			Attorney handwritten notations on 3/24/03 letter from Robert Swartz to Wendelin Wiedeking re: offer to license '685 patent reflecting provision of legal advice, attorney strategy in anticipation of litigation	AC/WP	2
60.	03/23/05	Karin Rivard, Esq.			Handwritten notes re: Harman lawsuit against MIT reflecting provision of legal advice and attorney strategy in anticipation of litigation	AC/WP	4
61.	03/25/05	Karin Rivard, Esq.	Magdalen Christian		Internal MIT communications re: Harman lawsuit against MIT reflecting provision of legal advice and attorney strategy in anticipation of litigation	AC/WP	5

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
62.	03/18/05	Tom Sadtler	Robert Fadel		MIT internal communication reflecting privileged communications with MIT counsel concerning the current lawsuit against MIT reflecting provision of legal advice and attorney strategy	AC/WP	4
63.	09/05/91	Secretary for Irene Abrams	Irene Abrams		Handwritten notation reflecting legal advice previously given by counsel re: prosecution	AC	1
64.	09/05/91	Irene Abrams	B. Jean Weidemier, Esq.		Handwritten notation reflecting request for legal advice re: patent prosecution	AC	1
65.	08/28/91	Irene Abrams	B. Jean Weidemier, Esq.		Handwritten notation reflecting request for legal advice re: patent prosecution	AC	1
66.	07/15/91	B. Jean Weidemier, Esq.	John Hynes	Irene Abrams	Internal MIT memorandum reflecting provision of legal advice and strategy re: license agreement	AC/WP	5
67.	05/10/91	Sam Pasternack, Esq.	John T. Preston	Nikki Borman; John Hynes	Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
68.	06/10/91	B. Jean Weidemier, Esq.	Diane Gaylor	John Preston; Philip Ritmueller	Attorney client communications reflecting provision of legal advice in the course of patent prosecution	AC	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
69.	02/25/91	B. Jean Weidemier, Esq.	Sam Pasternack, Esq.	Nikki Borman; John Hynes	Attorney client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
70.	12/03/90	B. Jean Weidemier, Esq.			Attorney handwritten notations reflecting provision of legal advice and communications with MIT counsel re: patent prosecution	AC	1
71.	08/21/90	Dorene M. Sorensen	Diane Gaylor		Attorney-client correspondence reflecting request for legal advice re: patent prosecution	AC	3
72.	05/24/90	Jim Davis	John Preston	Christopher M. Schmandt; Robert Greene	Internal MIT communication concerning request for legal advice from MIT's counsel re: patent prosecution	AC	1
73.	09/22/89	B. Jean Weidemier, Esq.			Attorney handwritten notations reflecting provision of legal advice re: patent prosecution	AC/WP	1
74.	06/13/90	John T. Preston	Sam Pasternack, Esq.		Attorney-client correspondence requesting legal advice re: patent prosecution	AC	1
75.	08/28/89	B. Jean Weidemier, Esq.	Robert Greene		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
76.	07/31/89	B. Jean Weidemier, Esq.			Attorney handwritten notations reflecting provision of legal advice re: patent prosecution	AC/WP	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
77.	07/12/89	B. Jean Weidemier, Esq.			Attorney handwritten notations containing a confidential communication reflecting provision of legal advice re: patent prosecution	AC/WP	1
78.	01/22/92	B. Jean Weidemier, Esq.			Handwritten notations containing a confidential communication reflecting communications with outside counsel requesting legal advice re: patent prosecution	AC/WP	1
79.	02/10/92	Diane Gaylor	B. Jean Weidemier, Esq.	Nikki Borman; John Hynes	Attorney-client correspondence and handwritten notations reflecting provision of legal advice re: patent prosecution	AC/WP	3
80.	06/16/92	Donna Baranski-Walker	Carl Accardo		Communications re: confidentiality agreements, patent license agreements, and patent prosecution reflecting request for legal advice; Email draft document prepared in anticipation of litigation (remainder of documents previously logged as Entry No. 80 now logged as Entry Nos. 766-775).	WP	3

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
81.	09/24/96	David Geist	Sam Pasternack, Esq.		Attorney-client communications reflecting provision of legal advice re: license agreement negotiations	AC/WP	1
82.	07/26/99	Jack Turner	Bruce Bullock	Carolyn Beaty	Email re: patent license agreement and agreement strategy reflecting provision of legal advice in anticipation of litigation; Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
83.	07/13/92	Donna Baranski-Walker	James R. Davis	John Hynes	Internal MIT communications reflecting communication with MIT counsel re: patent prosecution	AC	1
84.	07/13/92	Donna Baranski-Walker	Taro Hoshino	John Hynes	Correspondence reflecting substance of a communication with counsel reflecting provision of legal advice concerning patent prosecution	AC	1
85.	07/13/92	Donna Baranski-Walker	Christopher M. Schmandt	John Hynes	Internal MIT communications reflecting communication with MIT counsel re: patent prosecution	AC	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
86.	03/24/05	Robert Swartz	Jack Turner; Karin Rivard, Esq.; Walter Bender		Internal MIT communications re: current litigation with Harman reflecting provision of legal advice and attorney strategy in anticipation of litigation	AC/WP	2
87.	11/22/96	Sam Pasternack, Esq.	David Geist		Attorney-client correspondence reflecting provision of legal advice during prosecution	AC	1
88.	09/09/96	Sam Pasternack, Esq.	David Geist		Attorney-client correspondence and handwritten notations reflecting provision of legal advice pertaining to license negotiations in anticipation of litigation	AC/WP	3
89.	06/27/96	David Geist	Sam Pasternack, Esq.	Jack Turner	Attorney-client correspondence requesting legal advice pertaining to license negotiations in anticipation of litigation	AC/WP	1
90.	03/07/96	Sam Pasternack, Esq.	Jack Turner		Attorney-client correspondence and handwritten notation re: issued patent reflecting provision of legal advice and attorney strategy pertaining to license negotiations in anticipation of litigation	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
91.	06/21/96	Michelle O'Shea	Jarmila Hrbek		Internal MIT communications regarding documentation prepared at the request for MIT counsel concerning patent prosecution	AC	1
92.	03/24/05	Robert Swartz	Jack Turner; Karin Rivard, Esq.; Walter Bender		Internal MIT communications concerning current Harman litigation reflecting provision of legal advice and attorney strategy in anticipation of litigation	AC/WP	2
93.					Produced in its entirety as Bates Nos. MIT 05574		
94.		MIT Personnel / Counsel			Draft abstract of patent application reflecting attorney questions to inventor	AC/WP	1
95.					Produced in its entirety as Bates Nos. MIT 05575		
96.	07/05/89	James R. Davis; Christopher M. Schmandt			Documentation concerning patent prosecution prepared at the direction of MIT's counsel	AC	7
97.	10/25/90	Diane C. Gaylor	John T. Preston		Attorney-client correspondence providing legal advice re: patent prosecution	AC	4

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
98.	06/02/00	MIT TLO (Michelle)	MIT TLO		Internal MIT TLO document reflecting legal advice given during patent prosecution / maintenance Produced in redacted form as Bates No. MIT 06836-06843.	AC	1
99.	04/12/96	David Geist	Sam Pasternack, Esq.		Attorney-client correspondence re: issued patent requesting legal advice in anticipation of litigation	AC	14
100.	08/02/90	Diane Gaylor	James R. Davis		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
101.	07/26/90	Diane Gaylor	James R. Davis		Attorney-client correspondence and handwritten notation providing legal advice regarding patent prosecution	AC	41
102.	06/27/96	David Geist	Sam Pasternack, Esq.		Letter containing a confidential communication requesting legal advice concerning license negotiations in anticipation of litigation	AC/WP	3

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
103.	05/06/96	Jack Turner; David Geist	Robert Bloomberg	Nicholas Negroponte; Christopher Schmandt; Sandy Pentland; Pattie Maes; Andy Lippman; Robert Greene	Memorandum internal to MIT personnel prepared in anticipation of litigation re: license negotiations; (memo reflecting legal advice of MIT counsel relating to the '685 patent)	AC/WP	3
104.	04/05/96	David Geist	Sam Pasternack, Esq.		Letter containing a confidential communication reflecting request of legal advice re: license negotiations in anticipation of litigation	AC/WP	3
105.		Jack Turner			Handwritten notation reflecting communication with MIT counsel concerning license negotiations prepared in anticipation of litigation (redacted handwritten notes by an attorney reflecting the attorney's mental impressions regarding the '685 patent); Produced in redacted form as Bates Nos. MIT 02110 – MIT 02111	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
106.	03/07/96	Sam Pasternack, Esq.	Jack Turner		Letter containing a confidential communication reflecting provision of legal advice and attorney strategy re: licensing in anticipation of litigation	AC/WP	4
107.	03/05/96	David Geist	Sam Pasternack, Esq.		Letter containing a confidential communication requesting legal advice re: license negotiations prepared in anticipation of litigation	AC/WP	3
108.	08/16/90	Diane Gaylor	John Preston		Letter containing a confidential communication reflecting provision of legal advice re: patent prosecution	AC	54
109.	06/21/91	Jim Davis	Sam Pasternack, Esq.		Letter containing a confidential communication re: patent prosecution reflecting request for legal advice	AC	1
110.	06/27/90	William J. Hagen	Diane Gaylor		Letter containing a confidential communication responding to previous communication from counsel re: patent prosecution	AC	3
111.	06/13/90	John T. Preston	Sam Pasternack, Esq.		Letter containing a confidential communication requesting legal advice re: patent prosecution	AC	7

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
112.					Produced in its entirety as Bates Nos. MIT 06847-06854		
113.	08/13/96	Sam Pasternack, Esq.	David Geist		Attorney-client correspondence providing legal advice and reflecting attorney strategy re: license negotiations prepared in anticipation of litigation	AC/WP	2
114.	07/26/92	David Laurence Hall	Choate, Hall & Stewart		Attorney-client correspondence re: patent prosecution reflecting response to previous communication from counsel	AC	1
115.	07/27/92		David Laurence Hall		MIT internally prepared document prepared at the direction of counsel re: prosecution	WP	2
116.	05/05/92	Diane Gaylor	Philip Rittmueller		Attorney-client communications reflecting provision of legal advice regarding patent prosecution	AC	1
117.	05/04/92	Peter Murphy	Diane Gaylor		Handwritten notation prepared in response to privileged communication from counsel re: patent prosecution	AC	2
118.	04/27/92	Diane Gaylor	Keith, American Legal Services		Correspondence and handwritten notation reflecting provision of legal advice re: patent prosecution	AC	4

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
119.		Diane Gaylor	Judy N. Filamond		Attorney-client correspondence and handwritten notation reflecting provision of legal advice prepared in the course of patent prosecution	AC	1
120.	04/27/92	Brian D. Ogonowsky, Esq.	Diane Gaylor	Philip Rittmueller	Attorney-client communications reflecting provision of legal advice concerning patent prosecution	AC	2
121.	04/27/92	Sam Pasternack, Esq.	John Hynes		Attorney-client correspondence re: patent prosecution providing legal advice and attorney strategy	AC	11
122.	04/27/92	Diane Gaylor	Brian D. Ogonowsky, Esq.		Attorney-client communications reflecting provision of legal advice concerning patent prosecution	AC	2
123.	04/22/92	Secretary for Sam Pasternack, Esq.	Sam Pasternack, Esq.		Choate Internal handwritten message reflecting provision of legal advice re: patent prosecution	WP	1
124.	06/10/91	B. Jean Weidemier, Esq.	Diane Gaylor	John Preston; Philip Rittmueller	Attorney-client communications reflecting provision of legal advice concerning patent prosecution	AC	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
125.	03/20/92	MIT Personnel	Sam Pasternak, Esq.		Handwritten notation reflecting request for legal advice from Sam Pasternak, Esq. re: patent prosecution	AC	1
126.	03/04/92	Irene Abrams	Diane Gaylor		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	2
127.	02/10/92	Diane Gaylor	B. Jean Weidenmier, Esq.	Nikki Borman; John Hynes	Attorney-client correspondence and handwritten notations reflecting the provision of legal advice re: patent prosecution	AC	11
128.	07/23/91	Diane Gaylor	Brian D. Ogonowsky, Esq.		Attorney-client communications reflecting provision of legal advice concerning patent prosecution	AC	1
129.	08/01/91	Irene Abrams	Sam Pasternak, Esq.		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
130.	06/14/91	Diane Gaylor			Memorandum reflecting provision of legal advice re: patent prosecution concerning communication with MIT's counsel	AC	1
131.	07/08/91	Diane Gaylor	John T. Preston		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
132.	05/10/91	Sam Pasternack, Esq.	John T. Preston	Nikki Borman; John Hynes	Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
133.	11/14/90	Sam Pasternack, Esq.	John T. Preston		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
134.	10/30/90	John T. Preston	Diane Gaylor		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
135.	10/25/90	Diane Gaylor	John T. Preston		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	1
136.	08/23/90	MIT Personnel	Diane Gaylor		Memorandum containing a confidential communication reflecting request for legal advice re: patent prosecution	AC	3
137.	08/21/90	Dorene M. Sorenson	Diane Gaylor		Attorney-client correspondence reflecting response to previous communication from MIT counsel re: patent prosecution	AC	1
138.	08/16/90	Diane Gaylor	James R. Davis		Attorney-client correspondence reflecting provision of legal advice re: patent prosecution	AC	6

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
139.	10/02/91	B. Jean Weidemier, Esq.	Sam Pasternack, Esq.	Penny Blaisdell; Diane Gaylor; Robert Greene; John Hynes; John Preston; Philip Ritmueller	Attorney-client communications reflecting provision of legal advice concerning patent prosecution	AC	1
140.	02/25/91	B. Jean Weidemier, Esq.	Sam Pasternack, Esq.	Nikki Borman; John Hynes	Attorney-client communication re: reporting instructions reflecting provision of legal advice concerning patent prosecution	AC	1
141.	09/24/96	David Geist	Sam Pasternack, Esq.		Attorney-client communication reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation	AC/WP	1
142.	11/22/96	Sam Pasternack, Esq.	David Geist		Attorney-client communication reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation	AC/WP	13
143.	03/15/93	Sam Pasternack, Esq.	Jarmila Hrbek		Attorney-client correspondence reflecting provision of legal advice regarding patent prosecution	AC	2
144.	07/08/92	Sam Pasternack, Esq.	B. Jean Weidemier, Esq.	Philip Ritmueller; Brian D. Ogonowsky, Esq.	Attorney-client communications reflecting provision of legal advice concerning patent prosecution	AC	2

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145.	08/09/90 &ongoing	Sam Pasternack, Esq.			Checklist re: pending patent application reflecting provision of legal advice	AC	1
146.	11/22/96	Sam Pasternack, Esq.	David Geist		Attorney-client communication reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation	AC/WP	4
147.	09/09/96	Sam Pasternack, Esq.			Draft correspondence containing a confidential communication with handwritten notes re: license negotiations prepared in anticipation of litigation	WP	2
148.	06/27/96	David Geist	Sam Pasternack, Esq.	Jack Turner	Letter containing a confidential communication reflecting request for legal advice re: license negotiations prepared in anticipation of litigation	AC/WP	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
149.	03/07/96	Sam Pasternack, Esq.	Jack Turner		Letter with hand written notes re: issued patent and license reflecting provision of legal advice prepared in anticipation of litigation attaching correspondence to S. Kobayashi with privileged handwritten notations, produced in redacted form as MIT 01934-1935	AC/WP	2
150.	06/21/96	Michelle O'Shea	Jarmila Hirbek		Internal MIT communications reflecting documentation prepared at the direction of counsel concerning patent prosecution	AC	5
151.	05/06/96	Jack Turner; David Geist	Robert Bloomberg	Nicholas Negroponte; Christopher Schmandt; Sandy Pentland; Pattie Maes; Andy Lippman; Robert Greene	Memorandum internal to MIT personnel, handwritten notation prepared in anticipation of litigation re: license negotiations; (memo and handwritten notes reflecting legal advice of MIT counsel relating to the '685 patent)	AC/WP	4
152.	03/24/05	Robert Swartz	Jack Turner; Karin Rivard, Esq.; Walter Bender		Internal MIT Email re: Harman litigation reflecting provision of legal advice and attorney strategy in anticipation of litigation	AC/WP	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
153.	05/04/05	Robert Swartz	Steven Bauer, Esq.		Email re: Harman litigation reflecting provision of legal advice in anticipation of litigation	AC/WP	1
154.	05/04/05	Robert Swartz	Steven Bauer, Esq.		Email reflecting request for legal advice, attaching previously produced correspondence between Harman/Harman's counsel and MIT	AC/WP	23
155.	05/04/05	Robert Swartz	Steven Bauer, Esq.		Emails and handwritten notation re: Harman litigation reflecting provision of legal advice in anticipation of litigation	AC/WP	1
156.	05/06/05	Proskauer Rose LLP			Claim analysis reflecting provision of legal advice and attorney strategy in anticipation of litigation	AC/WP	2
157.	05/11/05	Proskauer Rose LLP			Claim analysis reflecting provision of legal advice and attorney strategy in anticipation of litigation	AC/WP	10
158.	05/05/05	John Pint, Esq.			Notes on website print-out reflecting provision of legal advice and attorney strategy in anticipation of litigation Produced in redacted form as Bates Nos. MIT 02118 – MIT 02123	AC/WP	5

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
159.	05/05/05	John Pint, Esq.			Notes on website print-out reflecting provision of legal advice and attorney strategy in anticipation of litigation Produced in redacted form as Bates Nos. MIT 02124 – MIT 02126	AC/WP	2
160.	05/05/05	John Pint, Esq.			Notes on website print-out reflecting provision of legal advice and attorney strategy in anticipation of litigation Produced in redacted form as Bates Nos. MIT 02127 – MIT -2129	AC/WP	1
161.	05/05/05	John Pint, Esq.			Notes on website print-out reflecting provision of legal advice and attorney strategy in anticipation of litigation Produced in redacted form as Bates Nos. MIT 02130 – MIT 02132	AC/WP	1
162.	05/05/05	John Pint, Esq.			Notes on website print-out reflecting provision of legal advice and attorney strategy in anticipation of litigation Produced in redacted form as Bates Nos. MIT 02133 – MIT 02141	AC/WP	4

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
163.	12/17/03	Jack Turner	Walter R. Bender		Email reflecting request for legal advice prepared in anticipation of litigation re: license negotiations	WP	1
164.	03/04/96	David Geist	Denise Lynch	Jack Turner	MIT Internal communications reflecting communications with MIT attorney requesting legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
165.					Produced in its entirety as Bates No. MIT 06855		
166.	07/31/95	Jack Turner	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	2
167.					Produced in its entirety as Bates No. MIT 06856		
168.	01/28/97	Jack Turner	David Geist		Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	2
169.	01/28/97	Bob Bloomberg	David Geist	Jack Turner Liz Yonda	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
170.	01/28/97	David Geist	Bob Bloomberg	Jack Turner	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
171.	04/11/97	David Geist	Denise Lynch	Jack Turner	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	18
172.	07/26/99	Jack Turner	Bruce Bullock	TLO File Carolyn Beaty	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
173.	07/26/99	Bruce Bullock	Jack Turner	TLO File Carolyn Beaty	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
174.					Removed from Privilege Log	NR	
175.					Produced in its entirety as Bates No. MIT 06857	WP	1
176.	10/25/00	TLODBA	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
177.	02/26/01	Jack Turner	Rick Cahaly		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	2
178.	11/27/00	TLODBA	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
179.	12/28/00	TLODBA	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
180.	01/25/01	TLODBA	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
181.	02/26/05	TLODBA	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
182.					Produced in redacted form as Bates No. MIT 06858-06859	NR	2
183.					Produced in redacted form as Bates No. MIT 06860-06861	NR	1
184.					Removed from Privilege Log	NR	
185.					Produced in redacted form as Bates No. MIT 06862-06864.001	NR	4
186.					Produced in redacted form as Bates No. MIT 06865	NR	1
187.					Produced in redacted form as Bates No. MIT 06866	NR	1
188.					Produced in redacted form as Bates No. MIT 06867	NR	1
189.					Produced in redacted form as Bates No. MIT 06868-06869	NR	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
190.					Produced in Redacted form as Bates No. MIT 06870	NR	1
191.					Produced in redacted form as Bates No. 06871-06873.001	NR	3
192.	08/13/04	Jack Turner	Robert Swartz; Robert D. Fadel		Internal MIT communications reflecting request for legal advice from MIT counsel re: patent prosecution	AC	1
193.	08/20/04	Jack Turner	Robert Swartz; Robert D. Fadel	Dan O'Brien	Internal MIT communications reflecting request for legal advice from MIT counsel re: patent prosecution	AC	1
194.					Produced in redacted form as Bates No. 06874	NR	1
195.	09/27/04	Jack Turner	Dan O'Brien	Denise M. Vaillancourt	Email requesting information for the purpose of rendering legal advice in the course of prosecution of patent	AC	2
196.	10/19/04	Jack Turner	Robert Swartz	TLO File	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations; (email reflecting legal advice from attorney Joe Grear relating to licensing)	AC/WP	2
197.	08/13/04	Robert Swartz	Jack Turner		Internal MIT communications reflecting request for legal advice from MIT counsel re: patent prosecution	AC	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
198.	08/20/04	Robert Swartz	Jack Turner	Robert Swartz; Robert D. Fadel; Dan O'Brien	Internal MIT communications reflecting request for legal advice from MIT counsel re: patent prosecution	AC	2
199.	08/24/04	Robert D. Fadel	Jack Turner	Dan O'Brien; Robert Swartz	Email containing a confidential communication reflecting legal advice previously provided re: patent prosecution	AC	2
200.	09/27/04	Dan O'Brien	Jack Turner		Email requesting information for the purpose of rendering legal advice in the course of prosecution of patent	AC	3
201.					Produced in its entirety as Bates No. MIT 06875		
202.	03/18/05	Jack Turner	Tom Sadtler	Jack Turner	Internal MIT emails re: incorporating communications with MIT inside and outside counsel regarding Harman's lawsuit against MIT prepared in anticipation of litigation	AC/WP	4
203.	03/18/05	Karin Rivard, Esq.	Jack Turner; Robert Swartz; Tom Sadtler; Walter Bender	Lita Nelsen; Alice P. Gast	Emails re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in anticipation of litigation	AC/WP	3
204.					Produced in its entirety as Bates No. MIT 06876		1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
205.	02/02/95	Robert Greene	Jack Turner	John J. Hynes; Christopher M. Schmandt; Robert Greene	Memorandum and Email and document prepared in anticipation of litigation re: license negotiations	WP	5
206.	06/28/91	Susan Browne	John J. Hynes		Internal MIT memorandum reflecting communications with counsel regarding patent prosecution	AC	2
207.	06/28/91	Susan Browne	John J. Hynes		Internal MIT memorandum reflecting communications with counsel regarding patent prosecution	AC	2
208.	04/26/91	Robert Greene	John J. Hynes	Robert Greene	Email re: prototype reflecting request for legal advice	AC	1
209.	09/22/03	Robert Swartz	Teresa Kratman		Internal MIT email regarding communications with counsel reflecting provision of legal advice concerning license negotiations prepared in anticipation of litigation; (email reflecting request for information by attorney Keith Vogt in order to render legal advice)	AC/WP	1
210.					Produced in its entirety as Bates No. MIT 06877		1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
211.	09/10/91	Nicholas Negroponte	John J. Hynes	p@hq.media.mit.edu; v@hq.media.mit.edu; Robert Greene	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
212.	09/30/91	Robert Greene	Penny Blaisdell	Nicholas Negroponte; Robert Greene	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (reflects legal advice from attorney J. Weidemer)	AC/WP	2
213.	08/23/91	Nicholas Negroponte	John Preston	John J. Hynes; Robert Greene	Memorandum internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
214.	08/16/91	Philip Rittmueller	Nicholas Negroponte; Robert Greene		Memorandum reflecting communication with MIT's counsel regarding patent prosecution	AC	2
215.	08/16/91	Philip Rittmueller	Nicholas Negroponte; Robert Greene		Memorandum with handwritten notations reflecting communication with MIT's counsel regarding patent prosecution	AC	2
216.	05/24/90	Jim Davis	John Preston	Christopher M. Schmandt; Robert Greene	Internal MIT email reflecting request for legal advice from counsel regarding patent prosecution	AC	1
217.					Produced in its entirety as Bates No. MIT 06878-6879		

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
218.					Produced in its entirety as Bates No. MIT 05583		
219.					Produced in its entirety as Bates No. MIT 05584		
220.					Produced in its entirety as Bates No. MIT 06880-06882		
221.					Produced in its entirety as Bates No. MIT 06883		
222.					Produced in its entirety as Bates No. MIT 06884		
223.					Produced in its entirety as Bates No. MIT 06885		
224.	12/08/93	Jack Turner	John J. Hynes		Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
225.		MIT Personnel	John J. Hynes		Handwritten notation reflecting request to obtain legal advice from outside counsel re: patent prosecution	AC	2
226.	02/15/95	David Geist	Aaron Bobick		Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
227.	01/28/97	Robert Bloomberg	David Geist	Jack Turner; Liz Yonda	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	2
228.					Produced in its entirety as Bates No. MIT 06886-06887		1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
229.	09/23/03	Teresa Kratman	Robert Swartz		Document internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (email providing information requested by attorney Vogt for the purpose of rendering legal advice)	AC/WP	3
230.					Produced in its entirety as Bates No. MIT 06888		
231.	01/28/97	David Geist	Robert Bloomberg	Jack Turner; David Geist	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
232.	12/23/94	Nicholas Negroponte	John J. Hynes; Jack Turner; Nicholas Negroponte; Robert Greene		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (email reflecting legal advice relating to licensing)	AC/WP	4
233.	12/23/94	Jack Turner	Nicholas Negroponte; Robert Greene; John J. Hynes		Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
234.					Produced in its entirety as Bates No. MIT 06889		
235.					Produced in its entirety as Bates No. MIT 06890		1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
236.	12/03/92	MIT Personnel/Counsel			Handwritten notations re: issued patent reflecting request to obtain legal advice and attorney strategy re: patent prosecution	AC	1
237.					Produced in its entirety as Bates No. MIT 06891		
238.					Produced in its entirety as Bates No. MIT 06892-06893		
239.	04/12/95	David Geist			Memorandum containing a confidential communication reflecting legal advice previously provided re: license negotiations; (memo reflecting legal advice previously provided relating to prosecution of the '685 patent)	AC/WP	1
240.	07/31/95	Jack Turner	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	2
241.	05/19/03	Robert Swartz	Walter Bender; Christopher M. Schmandt; Christopher M. Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations (remainder of documents previously logged as Entry No. 241 now logged as Entry Nos. 776-781).	WP	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
242.	05/12/04	Jack Turner			File and notes re: patent prosecution reflecting work product in anticipation of litigation; Produced as Bates No. MIT 05585	WP	1
243.	05/31/96	Jack Turner	Robert Bloomberg	lynn@media.mit.edu; Robert Greene; Sandy Pentland; Pattie Maes; David Geist; Christopher M. Schmandt	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
244.	05/31/96	Robert Bloomberg	Jack Turner	lynn@media.mit.edu; Robert Greene; Sandy Pentland; Pattie Maes; David Geist; Christopher M. Schmandt	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
245.	05/30/96	Nicholas Negroponte	Robert Bloomberg	Jack Turner; David Geist; Christopher M. Schmandt	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
246.	05/30/96	Robert Bloomberg	Nicholas Negroponte	David Geist; Jack Turner; Christopher M. Schmandt	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
247.	05/18/96	Nicholas Negroponte	Robert Bloomberg	David Geist; Robert Greene	Email internal to MIT personnel with handwritten notations prepared in anticipation of litigation in the context of license negotiations; (email with handwritten notes reflecting legal advice relating to licensing)	AC/WP	1
248.	05/16/96	Robert Bloomberg	Nicholas Negroponte		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
249.	05/16/96	Robert Bloomberg	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
250.	05/16/96	Jack Turner	Robert Bloomberg		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
251.	05/16/96	Nicholas Negroponte	Robert Bloomberg		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
252.	05/12/95	Robert Bloomberg	Robert Greene		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
253.	05/12/96	Robert Greene	Robert Bloomberg		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
254.	05/10/96	Robert Bloomberg	Robert Greene		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
255.	05/10/96	Robert Greene	Robert Bloomberg; Nicholas Negroponite; Robert Greene; Christopher M. Schmandt; Pattie Maes; Andy Lippman; Sandy Pentland		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
256.	05/10/95	Robert Bloomberg	Nicholas Negroponite		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
257.	05/10/96	Robert Bloomberg	Nicholas Negroponite		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
258.	05/09/95	Robert Bloomberg	Nicholas Negroponite; Robert Greene; Christopher M. Schmandt; Sandy Pentland; Pattie Maes; Andy Lippman	lynn@media	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
259.	05/02/95	Robert Greene	Nicholas Negroponite	Robert Greene; Christopher M. Schmandt John Hynes	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
260.					Produced in redacted form as Bates No. MIT 06894	NR	1
261.	04/10/95	David Geist	Robert Greene	John Hynes; Christopher M. Schmandt	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	4
262.					Produced in its entirety as Bates No. MIT 06895		
263.					Produced in its entirety as Bates No. MIT 06896-06900		
264.	08/16/95	Robert Greene	Nicholas Negroponite	Robert Greene	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	3
265.	05/02/95	Robert Greene	Nicholas Negroponite	Robert Greene; Christopher M. Schmandt; John Hynes	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
266.					Produced in its entirety as Bates No. MIT 6901		
267.					Produced in its entirety as Bates No. MIT 06902		1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
268.	04/11/97	David Geist	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
269.					Produced in its entirety as Bates No. MIT 06903		
270.					Produced in its entirety as Bates No. MIT 06904		
271.					Produced in its entirety as Bates No. MIT 06905		
272.	05/30/96	Robert Bloomberg	Nicholas Negroponte	David Geist; Jack Turner; Christopher M. Schmandt	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
273.	05/20/96	David Geist	Jack Turner	David Geist; Robert Greene	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
274.	05/20/96	Robert Bloomberg	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
275.					Produced in its entirety as Bates No. MIT 06906		
276.					Removed from Privilege Log	NR	
277.	08/16/95	Robert Greene	David Geist	Jack Turner; John Hynes	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1

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278.	11/13/02	Robert Swartz	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
279.	11/13/02	Robert Swartz	Jack Turner		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
280.	11/13/02	Jack Turner	Walter Bender	Jack Turner	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
281.					Produced in its entirety as Bates No. MIT 06907		
282.					Produced in its entirety as Bates No. MIT 06908		
283.					Produced in its entirety as Bates No. MIT 06909		
284.					Produced in its entirety as Bates No. MIT 06910		
285.					Produced in its entirety as Bates No. MIT 06911		
286.					Produced in its entirety as Bates No. MIT 06912		
287.					Produced in its entirety as Bates No. MIT 06913		
288.					Produced in its entirety as Bates No. MIT 06914		
289.					Removed from Privilege Log	NR	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
290.	03/11/05	Geoff Wilson	Robert Swartz	Walter Bender	Internal MIT communications reflecting request for legal advice from counsel concerning continued prosecution of patent	AC	2
291.					Produced in its entirety as Bates No. MIT 06915		
292.					Produced in its entirety as Bates No. MIT 06916-06917		
293.					Produced in its entirety as Bates No. MIT 06918-06919		
294.					Produced in its entirety as Bates No. MIT 06920		
295.					Produced in its entirety as Bates No. MIT 06921		
296.					Produced in its entirety as Bates No. MIT 06922		
297.					Produced in its entirety as Bates No. MIT 06923-6924		
298.					Produced in its entirety as Bates No. MIT 06925-06926		
299.					Produced in its entirety as Bates No. MIT 06927-06928		
300.					Produced in its entirety as Bates No. MIT 06929		
301.					Produced in its entirety as Bates No. MIT 06930-06932		

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302.					Produced in its entirety as Bates No. MIT 06933-06936		
303.					Produced in its entirety as Bates No. MIT 06937-06939		
304.					Produced in its entirety as Bates No. MIT 06940-06942		
305.					Produced in its entirety as Bates No. MIT 06943		
306.					Produced in its entirety as Bates No. MIT 06944-06946		
307.					Produced in its entirety as Bates No. MIT 06947-06948		
308.					Produced in its entirety as Bates No. MIT 06949-06951		
309.					Produced in its entirety as Bates No. MIT 06952		
310.					Produced in its entirety as Bates No. MIT 06953-06954		
311.					Produced in its entirety as Bates No. MIT 06955-06956		
312.					Produced in its entirety as Bates No. MIT 06957-06958		
313.					Produced in its entirety as Bates No. MIT 06959		
314.					Produced in its entirety as Bates No. MIT 06960		

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
315.					Produced in its entirety as Bates No. MIT 06961-06962		
316.					Produced in its entirety as Bates No. MIT 06963		
317.					Produced in its entirety as Bates No. MIT 06964-06966		
318.					Produced in its entirety as Bates No. MIT 06967-6968		
319.					Produced in its entirety as Bates No. MIT 06969-06970		
320.					Produced in its entirety as Bates No. MIT 06971-06973		
321.					Produced in its entirety as Bates No. MIT 06974-06975		
322.					Produced in its entirety as Bates No. MIT 06976-06977		
323.					Produced in its entirety as Bates No. MIT 06978-06979		
324.					Produced in its entirety as Bates No. MIT 06981-06987		
325.					Produced in its entirety as Bates No. MIT 06988-06989		
326.					Produced in its entirety as Bates No. MIT 06990-06991		

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
327.					Removed from Privilege Log	NR	
328.	05/06/96	Jack Turner; David Geist	Robert Bloomberg		Memorandum internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (memo and handwritten notes reflecting legal advice of MIT counsel relating to the '685 patent)	WP	5
329.	12/17/03	Jack Turner	Walter Bender		Communication internal to MIT drafted in the course of license negotiations prepared in anticipation of litigation; produced in redacted form as Bates nos. MIT 06612-06647 (remainder of documents previously logged as Entry No. 329 now logged as Entry Nos. 782-785).	WP	1
330.	05/02/95	Robert Greene	Nicholas Negroponte		Email, letter and document internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	4

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
331.		David Geist			Document internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (reflects legal advice previously provided relating to the '685 patent)	AC/WP	
332.	08/17/05	Robert Swartz	John Pint, Esq.		Email re: claim chart analysis reflecting request for legal advice in the course of current litigation	AC/WP	7
333.	12/23/94	John Hynes	Nicholas Negroponte	John Hynes; Jack Turner; Robert Greene	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
334.	12/23/94	Robert Greene	Nicholas Negroponte	John Hynes; Jack Turner	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (email reflecting legal advice relating to licensing)	AC/WP	1
335.		Jack Turner	Karin Rivard, Esq.		Handwritten notation re: Harman reflecting provision of legal advice in anticipation of current litigation	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
336.	03/31/05	Walter Bender	Jack Turner		Email internal to MIT personnel with handwritten notations prepared in anticipation of litigation in the context of license negotiations	WP	1
337.		Jack Turner			Handwritten notes containing confidential information reflecting provision of legal advice re: strategizing for license negotiations; (handwritten notes reflecting discussions with counsel in context of litigation with Harman)	AC/WP	2
338.					Produced as Bates nos. MIT 05586-05587		
339.	08/21/95	Robert Greene	David Geist	Jack Turner; John Hynes; Robert Greene	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
340.	05/04/05	Robert Swartz	Steven Bauer, Esq.		Email reflecting request for legal advice, attaching previously produced correspondence between Harman/Harman's counsel and MIT	AC/WP	17
341.	04/04/05	Charlie Call, Esq.	Jack Turner		Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1

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342.	04/04/05	Christopher M. Schmandt	Sam Pasternack, Esq.; Jack Turner		Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
343.	04/05/05	Christopher M. Schmandt	Jack Turner		Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in anticipation of litigation; Email internal to MIT personnel prepared in the course of current litigation in the context of license negotiations	AC/WP	1
344.	04/04/05	Sam Pasternack, Esq.	Jack Turner; Christopher M. Schmandt		Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	2
345.	04/05/05	Charlie Call, Esq.	Jack Turner; Christopher M. Schmandt; Sam Pasternack, Esq.	Ann Marie Flaherty; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
346.	04/05/05	Sam Pasternack, Esq.	Jack Turner; Christopher M. Schmandt	Ann Marie Flaherty; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	2

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
347.	04/12/05	Christopher M. Schmandt	Jack Turner	Sam Pasternack, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
348.	04/12/05	Sam Pasternack, Esq.	Christopher Schmandt; Jack Turner		Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	2
349.	04/12/05	Sam Pasternack, Esq.	Christopher M. Schmandt; Jack Turner		Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	2
350.	04/12/05	Christopher M. Schmandt	Sam Pasternack, Esq.; Jack Turner		Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
351.	05/04/05	Christopher M. Schmandt	Steven Bauer, Esq.	Jack Turner; Robert Swartz	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
352.	05/04/05	Steven Bauer, Esq.	Christopher M. Schmandt	Jack Turner; Robert Swartz	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1

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353.	05/04/05	Christopher M. Schmandt	Steven Bauer, Esq.	Jack Turner; Robert Swartz	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
354.	05/03/05	Robert Swartz	Jack Turner	Steven Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	2
355.	05/04/05	Steven Bauer, Esq.	Christopher M. Schmandt	Jack Turner; Robert Swartz	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	2
356.	05/04/05	Christopher M. Schmandt	Steven Bauer, Esq.	Jack Turner; Robert Swartz	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
357.	05/04/05	Robert Swartz	Steven Bauer, Esq.	Christopher M. Schmandt; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
358.	05/04/05	Steven Bauer, Esq.	Christopher M. Schmandt; Robert Swartz;	Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1

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359.	05/04/05	Christopher M. Schmandt	Steven Bauer, Esq.; Robert Swartz	Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
360.	05/04/05	Karin Rivard, Esq.	Christopher M. Schmandt	Steven Bauer, Esq.; Robert Swartz; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
361.	05/04/05	Robert Swartz	Christopher M. Schmandt	Steven Bauer, Esq.; Karin Rivard, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice and attorney strategy in the course of current litigation	AC/WP	1
362.		MIT Personnel/Counsel			Handwritten notations re: Harman's lawsuit against MIT reflecting request for legal advice in the current litigation	AC/WP	1
363.	07/25/03	Steve Brown	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in anticipation of litigation	AC/WP	2
364.					Produced in its entirety as Bates nos. MIT 06648-06649		
365.					Produced in its entirety as Bates nos. MIT 06650-06651		

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366.					Produced in its entirety as Bates nos. MIT 06652-06653		
367.	08/13/03	Steve Brown	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in anticipation of litigation	AC/WP	2
368.					Produced in its entirety as Bates nos. MIT 06654-06655		
369.					Produced in its entirety as Bates nos. MIT 06656-06657		
370.	03/17/05	Steven Bauer, Esq.	Karin Rivard, Esq.; Ben Palileo		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
371.	03/17/05	Ben Palileo	Steven Bauer, Esq.	Karin Rivard, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
372.	03/17/05	Steven Bauer, Esq.	Ben Palileo	Karin Rivard, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
373.					Produced in its entirety as Bates no. MIT 06658		
374.	03/17/05	Mark DiVincenzo, Esq.	Karin Rivard, Esq.	Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2

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375.	03/17/05	Karin Rivard	Mark DiVincenzo, Esq.	Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
376.	03/18/05	Jack Turner	Karin Rivard, Esq.	Lita Nelsen; Robert Swartz; Tom Sadtler; Walter Bender	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
377.	03/18/05	Karin Rivard, Esq.	Tom Sadtler		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	4
378.	03/18/05	Karin Rivard, Esq.	Jack Turner; Robert Swartz; Tom Sadtler	Lita Nelsen; Alice Gast	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
379.	03/21/05	Jack Turner	Robert Swartz	Karin Rivard, Esq.; Ann Marie Flaherty; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
380.	03/22/05	Ann Marie Flaherty	Robert Swartz	Karin Rivard, Esq.; Ann Marie Flaherty; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
381.	03/22/05	Robert Swartz	Ann Marie Flaherty	Karin Rivard, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2

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382.	03/22/05	Ann Marie Flaherty	Robert Swartz	Karin Rivard, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
383.	03/24/05	Robert Swartz	Jack Turner; Karin Rivard, Esq.; Walter Bender		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
384.	03/25/05	Karin Rivard, Esq.	Magdalen Christian		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
385.	03/28/05	Jack Turner	Alice Gast	Lita Nelsen; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
386.	03/28/05	Robert Swartz	Walter Bender; Karin Rivard, Esq.; Jack Turner		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
387.	03/29/05	Karin Rivard, Esq.	Mark DiVincenzo, Esq.	Alice Gast; Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
388.	03/29/05	Mark DiVincenzo, Esq.	Karin Rivard, Esq.	Alice Gast; Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2

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389.	03/26/05	Alice Gast	Mark DiVincenzo, Esq.; Karin Rivard, Esq.	Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
390.	03/29/05	Mark DiVincenzo, Esq.	Alice Gast; Karin Rivard, Esq.	Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
391.	03/29/05	Karin Rivard, Esq.	Alice Gast	Mark DiVincenzo, Esq.; Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
392.	03/29/05	Mark DiVincenzo, Esq.	Karin Rivard, Esq.; Alice Gast	Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
393.	03/29/05	Karin Rivard, Esq.	Mark DiVincenzo, Esq.	Alice Gast; Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	4
394.	03/29/05	Mark DiVincenzo, Esq.	Karin Rivard, Esq.	Richelle Nessralla, Esq.; Alice Gast; Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	4
395.	03/29/05	Karin Rivard, Esq.	Mark DiVincenzo, Esq.	Richelle Nessralla, Esq.; Alice Gast; Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	4

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396.	03/29/05	Alice Gast	Mark DiVincenzo, Esq.; Karin Rivard, Esq.	Jack Turner; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	5
397.	03/30/05	Alice Gast	Karin Rivard, Esq.	Jack Turner; Lita Nelsen; Alice Gast	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
398.	03/31/05	Lita Nelsen	Alice Gast	Karin Rivard, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
399.	03/31/05	Jack Turner	Alice Gast	Karin Rivard, Esq.; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
400.	03/31/05	Jack Turner	Walter Bender	Lita Nelsen; Alice Gast; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
401.	03/31/05	Richelle Nessaralla, Esq.	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
402.	03/31/05	Karin Rivard, Esq.	Lita Nelsen; Jack Turner; Alice Gast		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	2

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403.	03/31/05	Alice Gast	Jack Turner	Karin Rivard, Esq.; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
404.	04/05/05	Jack Turner	Christopher M. Schmandt; Sam Pasternack, Esq.; Charlie Call, Esq.	Ann Marie Flaherty; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
405.	04/05/05	Charlie Call, Esq.	Jack Turner; Christopher M. Schmandt; Sam Pasternack, Esq.	Ann Marie Flaherty; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	1
406.	04/05/05	Sam Pasternack, Esq.	Jack Turner; Christopher M. Schmandt; Charlie Call, Esq.	Ann Marie Flaherty; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	2
407.	04/08/05	Robert Swartz	Karin Rivard, Esq.		Email internal to MIT personnel re: Harman litigation against MIT prepared in the course of current litigation reflecting request for legal advice	AC/WP	1
408.	04/08/05	Robert Swartz	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1

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409.	04/08/05	Alice Gast	Walter Bender	Adele Santos; Robert A. Brown Jack Turner; Lita Nelsen; Alice Gast	Email internal to MIT personnel re: Harman's lawsuit against MIT prepared in the course of current litigation in the context of license negotiations	WP	2
410.	04/08/95	Lita Nelsen	Jack Turner; Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
411.	04/08/05	Lita Nelsen	Alice Gast	Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
412.	04/20/05	Jack Turner	Mark DiVincenzo, Esq.	Karin Rivard, Esq.; Alice Gast; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
413.	04/20/05	Mark DiVincenzo, Esq.	Jack Turner	Karin Rivard, Esq.; Alice Gast Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	3
414.	04/21/05	Jack Turner	Mark DiVincenzo, Esq.	Karin Rivard, Esq.; Alice Gast; Lita Nelsen	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3

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415.	04/25/05	Mark DiVincenzo, Esq.	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	3
416.	04/25/05	Richelle Nessralla, Esq.	Karin Rivard, Esq.	Mark DiVincenzo, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	2
417.	04/26/05	Jack Turner	Karin Rivard, Esq.	Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
418.	04/26/05	Karin Rivard, Esq.	Steven M. Bauer, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
419.	04/26/05	Karin Rivard, Esq.	Richelle Nessralla, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	2
420.	04/26/05	Karin Rivard, Esq.	Jack Turner		Email re: Harman's lawsuit against MIT provision of legal advice in the course of current litigation	AC/WP	2
421.	04/26/05	Richelle Nessralla, Esq.	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	2

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423.	04/26/05	Richelle Nessralla, Esq.	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	1
424.	04/26/05	Steven M. Bauer, Esq.	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	2
425.	04/26/05	Steven M. Bauer, Esq.	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	3
426.	04/27/05	Jack Turner	Steven M. Bauer, Esq.	Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
427.	04/27/05	Steven M. Bauer, Esq.	Jack Turner	Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of for legal advice in the course of current litigation	AC/WP	4
428.	04/27/05	Steven M. Bauer, Esq.	Jack Turner	Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	4

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429.	04/29/05	Steven M. Bauer, Esq.	Jack Turner; Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
430.	04/29/05	Karin Rivard, Esq.	Jack Turner		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
431.	04/29/05	Karin Rivard, Esq.	Magdalen Christian		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	1
432.	04/29/05	Jack Turner	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
433.	04/29/05	Karin Rivard, Esq.	Steven M. Bauer, Esq.; Mark DiVincenzo, Esq.	Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
434.	04/29/05	Steven M. Bauer, Esq.	Karin Rivard, Esq.; Mark DiVincenzo, Esq.	Jack Turner	Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	2
435.	04/29/05	Mark DiVincenzo, Esq.	Steven M. Bauer, Esq.; Karin Rivard, Esq.	Jack Turner	Email re: Harman's lawsuit against MIT reflecting provision legal advice and strategy in the course of current litigation	AC/WP	2

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436.	04/29/05	Karin Rivard, Esq.	Mark DiVincenzo, Esq.	Steven M. Bauer, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting request for legal advice and strategy in the course of current litigation	AC/WP	3
437.	04/29/05	Mark DiVincenzo, Esq.	Karin Rivard, Esq.	Steven M. Bauer, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	3
438.	04/29/05	Karin Rivard, Esq.	Mark DiVincenzo, Esq.	Steven M. Bauer, Esq.; Jack Turner	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	3
439.	05/03/05	Jack Turner	Steven M. Bauer, Esq.	Christopher M. Schmandt; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
440.	05/04/05	Steven M. Bauer, Esq.	Christopher M. Schmandt; Robert Swartz	Jack Turner Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	2
441.	05/10/05	Steven M. Bauer, Esq.	Jack Turner; Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	2

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442.	05/11/05	Karin Rivard, Esq.	Steven M. Bauer, Esq.	Jack Turner	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	2
443.	05/11/05	Jack Turner	Kimberly A. Mottley, Esq.	Steven M. Bauer, Esq.; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	2
444.	05/11/05	Jack Turner	Kimberly A. Mottley, Esq.	Steven M. Bauer, Esq.; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	2
445.	05/11/05	Kimberly A. Mottley, Esq.	Jack Turner	Steven M. Bauer, Esq.; Karin Rivard, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	2
446.	05/12/05	Karin Rivard, Esq.	Kimberly A. Mottley, Esq.	Jack Turner; Steven M. Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice and strategy in the course of current litigation	AC/WP	3
447.	05/12/05	Kimberly A. Mottley, Esq.	Karin Rivard, Esq.	Jack Turner; Steven M. Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	3

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448.	05/12/05	Karin Rivard, Esq.	Kimberly A. Mottley, Esq.	Jack Turner; Steven M. Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	3
449.	05/12/05	Karin Rivard, Esq.	Mark DiVincenzo, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice and strategy in the course of current litigation	AC/WP	4
450.	05/12/05	Karin Rivard, Esq.	Kimberly A. Mottley, Esq.	Jack Turner; Steven M. Bauer, Esq.; Mark DiVincenzo, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice and strategy in the course of current litigation	AC/WP	1
451.	05/12/05	Kimberly A. Mottley, Esq.	Karin Rivard, Esq.; Jack Turner; Mark DiVincenzo, Esq.	Steven M. Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	2
452.	05/12/05	Karin Rivard, Esq.	Kimberly A. Mottley, Esq.	Jack Turner; Mark DiVincenzo, Esq.; Steven M. Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	3
453.	05/12/05	Karin Rivard, Esq.	Kimberly A. Mottley, Esq.	Jack Turner; Mark DiVincenzo, Esq.; Steven M. Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice and strategy in the course of current litigation	AC/WP	2

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454.	05/12/05	Karin Rivard, Esq.	Mark DiVincenzo, Esq.		Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	1
455.	05/12/05	Jack Turner	Karin Rivard, Esq.; Kimberly A. Mottley, Esq.	Mark DiVincenzo, Esq.; Steven M. Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting request for legal advice in the course of current litigation	AC/WP	3
456.	05/12/05	Kimberly A. Mottley, Esq.	Jack Turner; Karin Rivard, Esq.	Mark DiVincenzo, Esq.; Steven M. Bauer, Esq.	Email re: Harman's lawsuit against MIT reflecting provision of legal advice and strategy in the course of current litigation	AC/WP	4
457.	05/12/05	Kimberly A. Mottley, Esq.	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	3
458.	05/12/05	Karin Rivard, Esq.	Richelle Nessralla, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	1
459.	05/12/05	Karin Rivard, Esq.	Kimberly A. Mottley, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	1
460.	05/12/05	Kimberly A. Mottley, Esq.	Karin Rivard, Esq.		Email re: Harman's lawsuit against MIT reflecting provision of legal advice in the course of current litigation	AC/WP	1

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461.					Produced in redacted form as Bates No. MIT 06992-06993	NR	2
462.					Produced in its entirety as Bates No. MIT 06994-07008		
463.					Produced in its entirety as Bates No. MIT 07009-07029		
464.					Produced in its entirety as Bates No. MIT 007030-07053		
465.		Robert Swartz			Handwritten document prepared in anticipation of litigation in the context of license negotiations	WP	1
466.		Charles Call, Esq.			Chart reflecting legal advice and strategy in anticipation of litigation	AC/WP	2
467.					Produced in its entirety as Bates nos. MIT 06659-06660		
468.		Robert Swartz	Bruce Bullock		Document internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	2
469.	2/14/92	Irene Abrams	John Hynes		Internal MIT memorandum reflecting communication with MIT counsel re: patent prosecution	AC	1
470.					Produced in its entirety as Bates No. MIT 07054		1

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471.	11/14/01	Robert Swartz			Document internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	11
472.	10/5/04	Charles Call, Esq.	Robert Swartz		Email requesting information for purpose of rendering legal advice re: license negotiations in anticipation of litigation	AC/WP	1
473.	10/5/04	Charles Call, Esq.	Robert Swartz		Email requesting information for rendering legal advice re: license negotiations in anticipation of litigation	AC/WP	1
474.	10/5/04	Charles Call, Esq.	Robert Swartz		Email requesting information for rendering legal advice re: license negotiations in anticipation of litigation	AC/WP	7
475.	10/5/04	Charles Call, Esq.	Robert Swartz		Email reflecting legal advice re: license negotiations in anticipation of litigation	AC/WP	1
476.	10/6/04	Charles Call, Esq.	Robert Swartz	Christopher M. Schmandt	Email reflecting legal advice re: license negotiations in anticipation of litigation	AC/WP	1
477.	10/6/04	Charles Call, Esq.	Robert Swartz	Christopher M. Schmandt	Email reflecting legal advice re: license negotiations in anticipation of litigation	AC/WP	1
478.	10/6/04	Charles Call, Esq.	Christopher M. Schmandt	Robert Swartz	Email requesting information for purpose of rendering legal advice in anticipation of litigation	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
479.	10/16/04	Charles Call, Esq.	Robert Swartz; Christopher M. Schmandt		Email rendering legal advice in context of license negotiations in anticipation of litigation	AC/WP	19
480.	10/19/04	Charles Call, Esq.	Christopher M. Schmandt; Robert Swartz		Email requesting information for purpose of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
481.	10/19/04	Charles Call, Esq.	Christopher M. Schmandt	Robert Swartz	Email rendering legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
482.	10/21/04	Charles Call, Esq.	Robert Swartz	Christopher M. Schmandt	Email rendering legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	2
483.	10/28/04	Charles Call, Esq.	Robert Swartz		Email rendering legal advice in context of licensing negotiations in anticipation of litigation Produced in redacted form as Bates No. MIT 04851	AC/WP	1
484.	11/5/04	Charles Call, Esq.	Robert M. McClure	Robert Swartz	Email rendering legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
485.	11/11/04	Charles Call, Esq.	Robert M. McClure	Robert Swartz	Email rendering legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
486.		Charles Call, Esq.			Draft letter reflecting legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	13
487.	11/15/04	Charles Call, Esq.	Robert Swartz		Email requesting information for purpose of rendering legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	2
488.		Charles Call, Esq.			Draft letter reflecting legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	25
489.	11/5/04	Charles Call, Esq.	Robert M. McClure	Robert Swartz; Charles Call, Esq.	Email rendering legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
490.	11/8/04	Robert M. McClure	Charles Call, Esq., Robert Swartz		Email referring to legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
491.	11/12/04	Robert M. McClure	Charles Call, Esq.	Robert Swartz	Email referring to legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	3
492.		Charles Call, Esq.			Draft letter to client reflecting legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	25

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
493.		Robert Swartz			Document reflecting strategy prepared in anticipation of litigation internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	6
494.	10/5/04	Robert Swartz	Charles Call, Esq.		Email providing information for purpose of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
495.	10/5/04	Robert Swartz	Charles Call, Esq.		Email reflecting request for legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
496.	10/9/04	Robert Swartz	Charles Call, Esq.	Christopher M. Schmandt	Email referring to request for information for purpose of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
497.	10/9/04	Robert Swartz	Charles Call, Esq.		Email referring to request for information for purpose of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
498.	10/16/04	Robert Swartz	Charles Call, Esq.	Christopher M. Schmandt	Email referring to request for information for purpose of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	4

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
499.	10/20/04	Robert Swartz	Charles Call, Esq.		Email referring to request for information for purpose of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	2
500.	11/15/04	Robert Swartz	Charles Call, Esq.		Email referring to legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	2
501.	11/11/04	Robert Swartz	Charles Call, Esq.		Email referring to legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
502.	10/5/04	Robert Swartz	Charles Call, Esq.		Email responding to request for information for purposes of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
503.	11/16/04	Robert Swartz	Charles Call, Esq.		Email requesting legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
504.	10/5/04	Robert Swartz	Charles Call, Esq.		Email requesting legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	2
505.	10/5/04	Robert Swartz	Charles Call, Esq.		Email providing information for purposes of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
506.	10/5/04	Robert Swartz	Charles Call, Esq.		Email responding to request for information for purposes of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
507.	10/6/04	Robert Swartz	Charles Call, Esq.		Email providing information for purposes of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
508.	11/4/04	Robert Swartz	Charles Call, Esq.	Robert M. McClure	Email providing information for purposes of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
509.	11/12/04	Robert Swartz	Charles Call, Esq.		Email responding to legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
510.	7/9/04	Robert Swartz	Joseph Grear, Esq.; Keith Vogt, Esq.		Email providing information for purposes of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
511.	7/9/04	Robert Swartz	Joseph Grear, Esq.; Keith Vogt, Esq.		Email providing information for purposes of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
512.	9/19/03	Robert Swartz	Keith Vogt, Esq.		Email responding to request for information for purposes of obtaining legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
513.	1/6/04	Robert Swartz	Keith Vogt, Esq.		Chart requesting legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
514.	3/2/04	Robert Swartz	Keith Vogt, Esq.		Email requesting legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
515.	10/5/04	Robert Swartz	Charles Call, Esq.		Email requesting legal advice in context of licensing negotiations in anticipation of litigation	AC/WP	1
516.		Robert Swartz			Draft correspondence reflecting provision of legal advice prepared in anticipation of litigation re: license negotiations	WP	3
517.		Robert Swartz			Handwritten document prepared in anticipation of litigation in the context of license negotiations	WP	1
518.		Robert Swartz			Handwritten document prepared in anticipation of litigation in the context of license negotiations	WP	1
519.		Robert Swartz			Handwritten document prepared in anticipation of litigation in the context of license negotiations	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
520.		Robert Swartz			Handwritten document prepared in anticipation of litigation in the context of license negotiations	WP	1
521.		Robert Swartz			Document with handwritten notations prepared in anticipation of litigation in the context of license negotiations	WP	1
522.		Robert Swartz			Email internal to MIT personnel with handwritten notations prepared in anticipation of litigation in the context of license negotiations	WP	1
523.		Robert Swartz			Handwritten notes reflecting provision of legal advice re: licensing negotiations prepared in anticipation of litigation	WP	2
524.		Robert Swartz			Handwritten notations providing information for the purpose obtaining legal advice in the context of license negotiations; Produced in redacted form as Bates No. MIT 04092 – MIT 04179	AC	6
525.	3/24/93	John T. Preston	Dr. James R. Davis; Christopher M. Schmandt; John Hynes		MIT internal communications reflecting communication with MIT counsel re: patent prosecution; Produced as Bates Nos. MIT 04073 – MIT 04082	AC	3

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
526.	3/15/93	Sam Pasternack, Esq.	John T. Preston		Attorney-client communication with handwritten notes reflecting provision of legal advice re: patent prosecution; Produced in redacted form as Bates No. MIT 04083	AC	1
527.		Robert Swartz			Handwritten notations providing information for the purpose obtaining legal advice, in the context of license negotiations Produced in redacted form as Bates Nos. MIT 02422 – MIT 02436	AC	2
528.		Robert Swartz			Handwritten notes reflecting provision of legal advice in anticipation of litigation, in the context of license negotiations; Produced in redacted form as Bates Nos. MIT 02420 – MIT 02421	WP	2
529.		Robert Swartz			Handwritten notes reflecting provision of legal advice in anticipation of litigation in the context of license negotiations; Produced in redacted form as Bates No. MIT 02419	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
530.					Produced in its entirety as Bates No. MIT 07066-07076		
531.					Produced in its entirety as Bates No. MIT 07077-07079		
532.					Produced in its entirety as Bates No. MIT 07080-07084		
533.					Formerly produced in redacted form as Bates Nos. MIT 01674 – MIT 01706; produced in its entirety as Bates nos. MIT 06668-06700		
534.					Formerly produced in redacted form as Bates Nos. MIT 01715 - 01748; Produced in its entirety as Bates nos. MIT 06701-06734		
535.		Karin Rivard, Esq.			Attorney draft agreement containing handwritten notes; Produced in redacted form as Bates Nos. MIT 01288 – MIT 01293	AC/WP	3

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
536.		MIT personnel	Robert Schwartz		Document drafted at the direction of counsel containing confidential non-responsive information; Produced in redacted form as Bates nos. MIT 01391-01397 (remainder of documents previously logged as Entry No. 536 now logged as Entry Nos. 800-802).	Non-responsive	2
537.		Jack Turner	Karin Rivard, Esq., Steven M. Bauer, Esq.	Lita Nelsen	E-mail containing non-responsive attorney-client communication sent in anticipation of litigation Produced in redacted form as Bates Nos. MIT 00141 – MIT 00144	AC/WP/	1
538.		John Pint, Esq.			Document with handwritten notes reflecting legal advice in anticipation of litigation Produced in redacted form as Bates Nos. MIT 02113 – MIT 02117	AC/WP	5
539.		MIT Personnel			Handwritten notes requesting legal advice in anticipation of litigation Produced in redacted form as Bates No. MIT 01301	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
540.		David Geist			Handwritten notations providing information for the purpose of obtaining legal advice, prepared in the context of license; Produced in redacted form as Bates Nos. MIT 01168 – MIT 01169	WP	1
541.	3/2/04	Keith Vogt, Esq.	Robert Swartz		Email reflecting legal advice regarding license negotiations prepared in anticipation of litigation Produced in redacted form as Bates No. MIT 05568	AC/WP	1
542.	2/26/05	Robert Swartz	Thomas Sadtler; Charles Call, Esq.; Christopher Schmandt; Walter Bender		Email containing a confidential communication providing information for purpose of obtaining legal advice re: license negotiations prepared in anticipation of litigation Produced in redacted form as Bates No. MIT 05578 – MIT 05579	AC/WP	1
543.	11/30/04	John H. Turner, Jr.	Robert Swartz	Karin Rivard, Esq.	Email reflecting legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
544.					Produced in its entirety as Bates No. MIT 07085		
545.	2/11/04	Keith Vogt, Esq.	Chris Schmandt	Robert Swartz; Joseph A. Grear, Esq.; mmstadlaw@aol.com	Email reflecting legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
546.	2/11/04	Keith Vogt, Esq.	Chris Schmandt	Joseph A. Grear, Esq.; munstadlaw@aol.com; Robert Swartz	Email requesting information for purpose of rendering legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
547.	2/11/04	Keith Vogt, Esq.	Robert Swartz		Email of attorney-client correspondence reflecting legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
548.	9/16/03	Keith Vogt, Esq.	Robert Swartz	Joseph A. Grear, Esq.	Email requesting information for purpose of rendering legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
549.					Produced in its entirety as Bates No. MIT 07086		
550.					Produced in its entirety as Bates No. MIT 07087		
551.					Produced in its entirety as Bates No. MIT 07088		
552.					Produced in its entirety as Bates No. MIT 07089		
553.					Produced in its entirety as Bates No. MIT 07090		
554.					Produced in its entirety as Bates No. MIT 07091-07092		
555.					Produced in its entirety as Bates No. MIT 07093		
556.					Produced in its entirety as Bates No. MIT 07094		

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
557.	2/28/05	Tom Sadtler	Robert Swartz	Charles Call, Esq.; Walter R. Bender	Email requesting legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
558.	1/18/05	Robert Swartz	Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
559.	1/18/05	Chris Schmandt	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
560.	11/14/04	Chris Schmandt	Robert Swartz	Charles Call, Esq.	Email requesting legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
561.	11/13/04	Chris Schmandt	Robert Swartz	Charles Call, Esq.	Email containing a confidential communication responding to legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
562.	10/19/04	Robert Swartz	Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
563.	10/16/04	Chris Schmandt	Charles Call, Esq.; Robert Swartz		Email providing information for purposes of obtaining legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
564.	10/12/04	Robert Swartz	Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
565.	10/9/04	Robert Swartz	Charles Call, Esq.	Chris Schmandt	Email responding to legal advice concerning license negotiations prepared in anticipation of litigation	AC/WP	1
566.	9/19/04	Robert Swartz	Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
567.	8/23/04	Robert Swartz	Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
568.	8/23/04	Robert Swartz	Walter Bender; Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
569.					Removed from Privilege Log	NR	
570.					Produced in its entirety as Bates No. MIT 07095		

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
571.	7/23/04	Robert Swartz	Walter Bender; Chris Schmandt		Email internal to MIT personnel concerning license negotiations prepared in anticipation of litigation; (emails reflecting discussions with Harman and with MIT's counsel relating to licensing)	AC/WP	2
572.					Produced in its entirety as Bates No. MIT 07096		
573.					Produced in its entirety as Bates No. MIT 07097		
574.	6/24/04	Robert Swartz	Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (emails reflecting discussions with Harman and with MIT's counsel relating to licensing)	AC/WP	1
575.	5/20/04	Robert Swartz	Walter Bender; Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (emails reflecting discussions with Harman and with MIT's counsel relating to licensing)	AC/WP	2
576.					Produced in its entirety as Bates No. MIT 07098		
577.					Produced in its entirety as Bates No. MIT 07099		

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ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
578.	3/26/04	Robert Swartz	Walter Bender; Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (emails reflecting discussions with Harman and with MIT's counsel relating to licensing)	AC/WP	2
579.					Produced in its entirety as Bates No. MIT 07100		
580.					Produced in its entirety as Bates No. MIT 07101		
581.					Produced in its entirety as Bates No. MIT 07102		
582.					Produced in its entirety as Bates No. MIT 07103		
583.	2/19/04	Robert Swartz	Walter Bender; Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (emails reflecting discussions with Harman and with MIT's counsel relating to licensing)	AC/WP	2
584.					Produced in its entirety as Bates No. MIT 07104		
585.					Produced in its entirety as Bates No. MIT 07105		
586.	2/12/04	Robert Swartz	Chris Schmandt; Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
587.	2/12/04	Chris Schmandt	Robert Swartz; Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
588.					Removed from Privilege Log	NR	
589.	1/6/04	Robert Swartz	Walter Bender; Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (emails reflecting discussions with Harman and with MIT's counsel relating to licensing)	AC/WP	2
590.	12/21/03	Robert Swartz	Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
591.					Produced in its entirety as Bates nos. MIT 06661-06663		
592.					Produced in its entirety as Bates No. MIT 07106		
593.					Produced in its entirety as Bates No. MIT 07107		
594.					Produced in its entirety as Bates No. MIT 07108-07109		
595.	12/15/03	Robert Swartz	Teresa Kratman		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
596.	12/15/03	Teresa Kratman	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	2
597.					Produced in its entirety as Bates nos. MIT 06664-06665		
598.	12/15/03	Robert Swartz	Walter Bender	Deb Cohen; Teresa Kratman; Chris Schmandt;	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
599.					Produced in its entirety as Bates No. MIT 07110		
600.	12/13/03	Chris Schmandt	Walter Bender	Deb Cohen; Robert Swartz; Teresa Kratman	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
601.					Produced in its entirety as Bates no. MIT 06666		
602.					Produced in its entirety as Bates no. MIT 06667		
603.	8/22/03	Robert Swartz	Walter Bender; Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (emails reflecting discussions with Harman and with MIT's counsel relating to licensing)	AC/WP	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
604.	7/24/03	Robert Swartz	Walter Bender; Chris Schmandt		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (emails reflecting discussions with Harman and with MIT's counsel relating to licensing)	AC/WP	2
605.	5/7/03	Chris Schmandt	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
606.	2/28/03	Chris Schmandt	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
607.	2/28/03	Walter Bender	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
608.	2/11/03	Robert Swartz	Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
609.	2/11/03	Walter Bender	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
610.	2/11/03	Robert Swartz	Walter Bender		Email, letter draft document internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	2
611.					Produced in its entirety as Bates No. MIT 07111		
612.	9/11/01	Bruce Bullock	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
613.	9/10/01	Robert Swartz	Bruce Bullock		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
614.	9/7/01	Robert Swartz	Bruce Bullock		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
615.	9/7/01	Bruce Bullock	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
616.	9/6/01	Robert Swartz	Bruce Bullock		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
617.					Produced in its entirety as Bates No. MIT 07112		

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
618.					Produced in its entirety as Bates No. MIT 07113		
619.	12/15/99	John H. Turner, Jr.	tlofile@mit.edu; Andrew Barry		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	6
620.	7/26/99	Bruce Bullock	John H. Turner, Jr.	tlofile@mit.edu; Carolyn Beatty	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
621.	7/26/99	John H. Turner, Jr.	Bruce Bullock	tlofile@mit.edu; Carolyn Beatty	Email internal to MIT personnel prepared in anticipation of litigation re: license negotiations	WP	1
622.		Samuel Pasternack, Esq.			Handwritten notations containing a confidential communication reflecting provision of legal advice concerning patent prosecution; produced in redacted form as Bates No. MIT 05719	AC/WP	1
623.	11/22/96	Samuel Pasternack, Esq.	David Geist		Letter containing a confidential communication reflecting provision of legal advice reflecting request for legal advice concerning license negotiations; produced in redacted form as Bates Nos. MIT 05746-5748	AC/WP	1
624.	06/27/96	David Geist	Samuel Pasternack, Esq.		Letter containing a confidential communication reflecting request for legal advice in	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					the context of license negotiations; produced in redacted form as Bates Nos. MIT 057490-05751		
625.	11/22/96	Samuel Pasternack, Esq.	David Geist		Letter with handwritten notations containing a confidential communication reflecting request for legal advice in the context of license negotiations; produced in redacted form as Bates Nos. MIT 05746-5748	AC/WP	1
626.	03/07/96	Samuel Pasternack, Esq.	John H. Turner, Jr.		Letter with handwritten notations containing a confidential communication reflecting provision of legal advice re: license negotiations; produced in redacted form as Bates Nos. MIT 06011-06014	AC/WP	1
627.	04/05/96	David Geist	Samuel Pasternack, Esq.		Letter containing a confidential communication reflecting provision of legal advice in the context of license negotiations; produced in redacted form as Bates Nos. MIT 06032-06034	AC/WP	1
628.	04/12/96	David Geist	Samuel Pasternack, Esq.		Letter providing information for the purpose of obtaining legal advice in the context of	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					license negotiations; produced in redacted form as Bates Nos. MIT 06035-06047		
629.	04/27/92	John Hynes	Samuel Pasternack, Esq.		Letter containing a confidential communication reflecting request for legal advice in the course of prosecution of patent	AC	11
630.	04/27/92	Diane Gaylor	Brian Ogonowsky, Esq.		Letter containing a confidential communication reflecting provision of legal advice regarding patent prosecution; produced in redacted form as Bates Nos. MIT 06109-06119	AC	1
631.		Samuel Pasternack, Esq.			Document with attorney handwritten notations containing a confidential communication reflecting provision of legal advice; produced in redacted form as Bates Nos. MIT 06123-06125	AC	
632.		Samuel Pasternack, Esq.			Agreement with attorney handwritten notations regarding license negotiations prepared in anticipation of litigation; produced in redacted form as Bates Nos. MIT 06126-06130	AC/WP	1
633.	07/08/92	Samuel Pasternack, Esq.	Jean Weidemier, Esq.	Philip Rittmueller	Attorney-client	AC	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
				Brian Ogonowsky, Esq.	correspondence reflecting provision of legal advice regarding patent prosecution; produced in redacted form as Bates Nos. 06156-06157		
634.		David Geist	Samuel Pasternack, Esq.		Letter with handwritten notations containing a confidential communication reflecting request for legal advice in the context of license negotiations; produced in redacted form as Bates Nos. MIT 06158-06159	AC/WP	1
635.	03/05/96	David Geist	Samuel Pasternack, Esq.		Attorney-client communications re: license negotiations reflecting request for legal advice in the context of license negotiations; produced in redacted form as Bates Nos. MIT 06160-06162	AC/WP	1
636.		Diane Gaylor	Judy Filamond		Document with attorney handwritten notations rendering legal advice in the course of prosecution of patent	AC	1
637.		Samuel Pasternack, Esq.			Draft document containing a confidential communication reflecting provision of legal advice in the course of prosecution of patent	AC	14
638.		Samuel Pasternack, Esq.			Draft document	AC	14

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					containing a confidential communication reflecting provision of legal advice in the course of prosecution of patent		
639.		Samuel Pasternack, Esq.			Draft document with attorney handwritten notations containing a confidential communication reflecting provision of legal advice in the course of prosecution of patent	AC	15
640.		Samuel Pasternack, Esq.			Handwritten document with attorney handwritten notations containing a confidential communication re: license negotiations	WP/AC	1
641.		Samuel Pasternack, Esq.			Handwritten document with attorney handwritten notations containing a confidential communication reflecting provision of legal advice in the course of prosecution of patent	AC	1
642.	06/90	James Davis	Samuel Pasternack, Esq.		Fax with handwritten notations containing a confidential communication and reflecting a request for legal advice in the course of prosecution of patent	AC	3
643.	10/25/90	Jennifer Ramsay for Diane Gaylor	John Preston		Attorney-client communications	AC	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					rendering legal advice in the course of prosecution of patent		
644.	06/10/91	Jean Weidemier, Esq.	Diane Gaylor	John Preston Philip Rittmueller	Attorney-client communication rendering legal advice in the course of prosecution of patent	AC	1
645.	03/20/92	Samuel Pasternack, Esq.			Attorney-client communications with attorney handwritten notations reflecting request for legal advice re: license negotiations prepared in anticipation of litigation in the course of prosecution of patent	AC/WP	1
646.	03/22/92	Samuel Pasternack, Esq.			Attorney-client communications with attorney handwritten notations reflecting request for legal advice in the course of prosecution of patent	AC	2
647.	04/27/92	Brian Ogonowsky, Esq.	Diane Gaylor	Philip Rittmueller	Attorney-client communications reflecting provision of legal advice and responding to previous attorney-client communications concerning patent prosecution	AC	1
648.	04/27/92	Diane Gaylor	Keith (Last name unknown)		Communication by agent of MIT requesting information for the purpose of rendering legal	AC	3

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AC = Attorney-Client Privileged
WP = Work Product Protected
NR = Non-Responsive

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					advice in the course of prosecution of patent		
649.	08/12/92	Diane Gaylor			Document referring to a confidential communication rendering legal advice in the course of prosecution of patent	AC	1
650.	03/07/96	Samuel Pasternack, Esq.	John H. Turner, Jr.		Attorney-client communications reflecting provision of legal advice re: license negotiations	AC/WP	4
651.		Samuel Pasternack, Esq.			Patent with attorney handwritten notations reflecting provision of legal advice re: time billed	AC	22
652.		Samuel Pasternack, Esq.			Draft patent claims with attorney handwritten notations in the course of prosecution of patent	AC	8
653.		Samuel Pasternack, Esq.			Draft patent claims with attorney handwritten notations in the course of prosecution of patent	AC	53
654.		Samuel Pasternack, Esq.			Draft patent claims with attorney handwritten notations in the course of prosecution of patent	AC	53
655.		Samuel Pasternack, Esq.			Draft document created in the course of providing legal advice re: patent prosecution	AC	2
656.		Samuel Pasternack, Esq.			Draft document created in the course of providing legal advice re: patent	AC/WP	5

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
657.		Samuel Pasternack, Esq.			prosecution Draft document with attorney handwritten notations created in the course of providing legal advice re: patent prosecution	AC/WP	
658.		James Davis	Samuel Pasternack, Esq.		Draft document providing information for the purpose of obtaining legal advice re: patent prosecution	AC/WP	
659.		Samuel Pasternack, Esq.			Draft document with attorney handwritten notations created in the course of providing legal advice re: patent prosecution	AC/WP	130
660.		Samuel Pasternack, Esq.			Draft document created in the course of providing legal advice re: patent prosecution	AC/WP	3
661.	06/21/90	James Davis	Samuel Pasternack, Esq.		Draft document created in the course of providing legal advice re: patent prosecution	AC/WP	18
662.	06/21/90	MIT	Samuel Pasternack, Esq.		Attorney-client communications reflecting provision of legal advice in the course of patent prosecution produced in redacted form as MIT 05654-05655	AC	2
663.	10/02/91	Jean Weidemier, Esq.	Samuel Pasternack, Esq.	Penny Blaisdell Diane Gaylor Robert Greene	Attorney-client communications reflection provision of	AC	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
				John Hynes John Preston Philip Rittmueller	legal advice concerning patent prosecution		
664.	10/06/04	MIT Personnel	Charles Call, Esq.		Attorney-client communications reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation; Produced in redacted form as Bates nos. MIT 06541-06547	AC/WP	7
665.	10/05/04	Robert Swartz	Charles Call, Esq.		Attorney-client communications reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation; Produced in redacted form as Bates no. MIT 06548	AC/WP	1
666.	10/28/04	Charles Call, Esq.	Robert Swartz		Attorney-client communications reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation; Produced in redacted form as Bates no. MIT 06549	AC/WP	1
667.	02/26/05	Robert Swartz	Thomas Sadtler Charles Call, Esq. Christopher M. Schmandt Walter Bender		Attorney-client communications reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation;	AC/WP	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					Produced in redacted form as Bates nos. MIT 06550-06551		
668.	02/28/05	Thomas Sadtler	Robert Swartz	Charles Call, Esq. Walter Bender	Attorney-client communications reflecting provision of legal advice re: license negotiations prepared in anticipation of litigation; Produced in redacted form as Bates nos. MIT 06552-06554	AC/WP	3
669.	10/06/04	MIT Personnel	Charles Call, Esq.		Attorney-client communications requesting legal advice in the course of license negotiations; Produced in redacted form as Bates nos. MIT 06555-06567	AC/WP	
670.	10/13/04	MIT Personnel	Charles Call, Esq.		Attorney-client communications requesting legal advice in the course of license negotiations; Produced in redacted form as Bates nos. MIT 06568-06571	AC/WP	4
671.	01/20/05	MIT Personnel	Charles Call, Esq.		Attorney-client communications requesting provision of legal advice in course of license negotiations	AC/WP	10
672.		Charles Call, Esq.			Document with attorney handwritten notations reflecting provision of	WP	165

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					legal advice in course of license negotiations		
673.		Charles Call, Esq.			Draft document reflecting request for legal advice in course of patent prosecution	AC	4
674.	01/21/05	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
675.	11/16/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
676.	11/15/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	3
677.	11/15/04	Charles Call, Esq.	Robert Swartz		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	2
678.	11/15/04	Charles Call, Esq.	Robert Swartz		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
679.	11/15/04	Charles Call, Esq.	Christopher M. Schmandt Robert Swartz		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
680.	11/14/04	Christopher M. Schmandt	Robert Swartz	Charles Call, Esq.	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
681.	11/13/04	Christopher M. Schmandt	Robert Swartz	Charles Call, Esq.	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	2
682.	11/12/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
683.	11/12/04	Robert M. McClure	Charles Call, Esq.	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	4
684.	11/11/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
685.	11/11/04	Robert M. McClure	Charles Call, Esq.	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
686.	11/11/04	Charles Call, Esq.	Robert M. McClure	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
687.	11/11/04	Charles Call, Esq.	Robert M. McClure	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					communications requesting provision of legal advice in the context of licensing negotiations		
688.	11/08/04	Robert M. McClure	Charles Call, Esq. Robert Swartz		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
689.	11/05/04	Robert M. McClure	Charles Call, Esq.	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
690.	11/05/04	Charles Call, Esq.	Robert M. McClure Charles Call, Esq.	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
691.	11/05/04	Charles Call, Esq.	Robert M. McClure Charles Call, Esq.	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	2
692.	11/05/04	Charles Call, Esq.	Robert M. McClure	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	2
693.	11/04/04	Robert Swartz	Charles Call, Esq.	Robert M. McClure	Email providing information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	1
694.	10/21/04	Charles Call, Esq.	Robert Swartz	Christopher M. Schmandt	Email of attorney-client communications	AC/WP	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					requesting provision of legal advice in the context of licensing negotiations		
695.	10/20/04	Robert Swartz	Charles Call, Esq.		Email referring to legal advice previously provided in the context of licensing negotiations	AC/WP	1
696.	10/19/04	Christopher M. Schmandt	Charles Call, Esq. Robert Swartz		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
697.	10/19/04	Christopher M. Schmandt	Charles Call, Esq.	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
698.	10/19/04	Charles Call, Esq.	Christopher M. Schmandt Robert Swartz		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
699.	10/19/04	Charles Call, Esq.	Christopher M. Schmandt	Robert Swartz	Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
700.	10/18/04	Robert Swartz	Charles Call, Esq. Christopher M. Schmandt		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
701.	10/16/04	Robert Swartz	Charles Call, Esq.	Christopher M. Schmandt	Email of attorney-client communications providing information for purpose of obtaining legal	AC/WP	3

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					advice in the context of licensing negotiations		
702.	10/16/04	Christopher M. Schmandt	Charles Call, Esq. Robert Swartz		Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	2
703.	10/16/04	Christopher M. Schmandt	Charles Call, Esq. Robert Swartz		Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	1
704.	10/16/04	Charles Call, Esq.	Christopher M. Schmandt Robert Swartz		Email of attorney-client communications reflecting provision of legal advice in the context of licensing negotiations	AC/WP	3
705.	10/09/04	Robert Swartz	Charles Call, Esq.	Christopher M. Schmandt	Email of attorney-client communications reflecting provision of legal advice in the context of licensing negotiations	AC/WP	2
706.	10/09/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of license negotiations	AC/WP	2
707.	10/07/04	Christopher M. Schmandt	Charles Call, Esq.		Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of license negotiations	AC/WP	3

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
708.	10/07/04	Charles Call, Esq.	Christopher M. Schmandt		Email of attorney-client communications reflecting provision of legal advice in the context of licensing negotiations	AC/WP	1
709.	10/06/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of license negotiations	AC/WP	1
710.	10/06/04	Christopher M. Schmandt	Charles Call, Esq. Robert Swartz		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	1
711.	10/06/04	Christopher M. Schmandt	Charles Call, Esq.		Email of attorney-client communications made in preparation of confidential communication reflecting provision of legal advice in the context of license negotiations	AC/WP	1
712.	10/06/04	Christopher M. Schmandt	Charles Call, Esq.	Robert Swartz	Email of attorney-client communications reflecting request for legal advice in the context of license negotiations	AC/WP	1
713.	10/06/04	Christopher M. Schmandt	Charles Call, Esq.		Email of attorney-client communications made in preparation of confidential communication reflecting provision of legal advice in the context of license	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
714.	10/06/04	Charles Call, Esq.	Robert Swartz	Christopher M. Schmandt	negotiations Email of attorney-client communications reflecting provision of legal advice in the context of license negotiations	AC/WP	1
715.	10/06/04	Charles Call, Esq.	Christopher M. Schmandt		Email of attorney-client communications reflecting provision of legal advice in the context of license negotiations	AC/WP	1
716.	10/06/04	Charles Call, Esq.	Christopher M. Schmandt	Robert Swartz	Email of attorney-client communications requesting information for purpose of rendering legal advice in the context of license negotiations	AC/WP	1
717.	10/06/04	Charles Call, Esq.	Christopher M. Schmandt		Email of attorney-client communications requesting information for purpose of rendering legal advice in the context of license negotiations	AC/WP	1
718.	10/05/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	1
719.	10/05/04	Charles Call, Esq.	Robert Swartz		Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	1
720.	10/05/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					communications providing information for purpose of obtaining legal advice in the context of licensing negotiations		
721.	10/05/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	2
722.	10/05/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications referring to legal advice previously provided in the context of licensing negotiations	AC/WP	2
723.	10/05/04	Robert Swartz	Charles Call, Esq.		Email of attorney-client communications requesting provision of legal advice in the context of licensing negotiations	AC/WP	2
724.	10/05/04	Christopher M. Schmandt	Robert Swartz	Charles Call, Esq.	Email of attorney-client communications providing information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	1
725.	10/05/04	Charles Call, Esq.	Robert Swartz		Email of attorney-client communications requesting information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	1
726.	10/05/04	Charles Call, Esq.	Robert Swartz		Email of attorney-client communications requesting information for	AC/WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
					purpose of rendering legal advice in the context of licensing negotiations		
727.	10/05/04	Charles Call, Esq.	Robert Swartz		Email of attorney-client communications requesting information for purpose of obtaining legal advice in the context of licensing negotiations	AC/WP	1
728.	10/05/04	Charles Call, Esq.	Robert Swartz		Email of attorney-client communications rendering provision of legal advice in the context of licensing negotiations	AC/WP	1
729.		Charles Call, Esq.			Draft document reflecting request for legal advice in the context of licensing negotiations	WP	6
730.		Charles Call, Esq.			Draft document reflecting provision of legal advice and attorney strategy and mental impressions in the context of licensing negotiations	WP	10
731.		Charles Call, Esq.			Draft document reflecting provision of legal advice and attorney strategy and mental impressions in the context of licensing negotiations	WP	9
732.		Charles Call, Esq.			Draft document reflecting provision of legal advice and attorney strategy and mental impressions in the context of licensing negotiations	WP	9

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
733.		Charles Call, Esq.			Memorandum reflecting provision of legal advice in the context of licensing negotiations	AC/WP	1
734.		Charles Call, Esq.			Document with handwritten annotations Attorney working copy of Davis Thesis, reflecting request for legal advice in the context of licensing negotiations	WP	2
735.		Charles Call, Esq.			Document with handwritten annotations reflecting request for legal advice in the context of licensing negotiations	WP	83
736.	6/90-12/96	Samuel Pasternack, Esq.			Document containing attorney billing records reflecting work done during prosecution and license negotiations	AC/WP	12
737.	12/2/88	Hidehiro Matsumoto	Jim Davis	Christopher Schmandt	Produced in its entirety as Bates Nos. MIT 04359-04361		3
738.	1/28/89	Jim Davis	hovy@venera.isi.edu	Jim Davis	Email communication not related to the patent in suit Produced in redacted form as Bates Nos. MIT 04361-04362	NR	2
739.	2/13/1989	Jim Davis	chin@ceta.ics.hawaii.edu		Email communication not related to the patent in suit Produced in redacted form as Bates Nos. MIT 04362-04363	NR	2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
740.	2/13/89	David Chin	Jim Davis		Email communication not related to the patent in suit Produced in redacted form as Bates No. MIT 04363	NR	1
741.	3/23/89	Jim Davis	Christopher Schmandt		Email communication not related to the patent in suit Produced in redacted form as Bates Nos. MIT 04363-04364	NR	2
742.	5/17/89	Barry Arons	Christopher Schmandt Jim Davis		Produced in its entirety as Bates No. MIT 04365		1
743.	7/3/89	Jim Davis	Christopher Schmandt		Produced in its entirety as Bates Nos, MIT 04366-04367		2
744.	7/12/89	Jim Davis	Christopher Schmandt		Produced in its entirety as Bates Nos, MIT 04367-04368		2
745.	8/12/89	David Chapman	Jim Davis		Produced in its entirety as Bates Nos. MIT 04368-04369		2
746.	8/30/89	Jim Davis			Produced in its entirety as Bates No. MIT 04369		1
747.	9/1/89	Sucharita Gopal	Jim Davis		Email communication not related to the patent in suit Produced in redacted form as Bates No. MIT 04369	NR	1
748.	3/29/90	Jim Davis	Jim Davis		Produced in its entirety as Bates No. MIT 04370		1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
749.	3/29/90	Jim Davis	Fuqua		Email communication not related to the patent in suit Produced in redacted form as Bates Nos. MIT 04370-04371	NR	2
750.	4/26/90	Jim Davis	Christopher Schmandt		Produced in its entirety as Bates Nos. MIT 04371-04372		2
751.	5/24/90	Jim Davis	Jim Davis		Produced in its entirety as Bates No. MIT 04372		1
752.	7/22/90	Rodney Hoffman			Email communication not related to the patent in suit Produced in redacted form as Bates Nos. MIT 04372-04373	NR	2
753.	8/28/90	Jim Davis	Jim Davis	Christopher Schmandt	Produced in its entirety as Bates No. MIT 04373		1
754.	8/28/90	Jim Davis	Jim Davis	Christopher Schmandt	Produced in its entirety as Bates No. MIT 04373		1
755.	10/30/90	Jim Davis	bsd/bsd.mail	Christopher Schmandt	Produced in its entirety as Bates No. MIT 04374		1
756.	10/30/90	Jim Davis	Walter Ronmac Muriel Bolt dbk		Email containing confidential communication reflecting legal advice Produced in redacted form as Bates No. MIT 04374	NR	1
757.	11/29/90	cgant@media-lab.media.mit.edu	Jim Davis	cgant@media-lab.media.mit.edu	Produced in its entirety as Bates No. MIT 04374		1
758.	2/7/91	Jussi Karlgren	Jim Davis		Produced in its entirety as Bates Nos. MIT 04374-04375		2

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
759.	4/24/91	Jeff Helgesen			Email communication not related to the patent in suit Produced in redacted form as Bates Nos. MIT 04375-04376	NR	2
760.	12/13/03	Chris Schmandt	Walter Bender	deco@media.mit.edu; Robert Swartz; tkratman@media.mit.edu	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
761.	11/18/03	Chris Schmandt	Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (email reflecting discussion with counsel in which legal advice was provided)	AC/WP	1
762.	7/23/04	Chris Schmandt	Robert Swartz		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
763.					Produced in its entirety as Bates No. MIT 07114-07115		
764.					Produced in its entirety as Bates No. MIT 07116		
765.					Produced in its entirety as Bates No. MIT 07117-07119		1
766.					Produced in its entirety as Bates No. MIT 07120-07122		

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
767.					Produced in its entirety as Bates No. MIT 07123		
768.	5/18/92	Alla Skorokhod	Carl Accardo	Donna Baranski-Walker	Letter internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
769.	3/4/92	Irene Abrams	Diane Gaylor		Faxed communication reflecting request for legal advice in course of patent prosecution	AC	1
770.	3/4/92	MIT Accounting Office	MIT TLO	Irene Abrams Nikki Borman Denise Vaillancourt Jean Weidmeyer, Esq.	Billing record reflecting request for legal advice in course of patent prosecution	AC	1
771.	3/4/92	Rebecca Prendergast	Irene Abrams	Rebecca Prendergast	Email reflecting request for legal advice in course of patent prosecution	AC	1
772.	2/27/92	Irene Abrams	John Hynes	Jean Weidmeyer; Rebecca Prendergast	Letter reflecting request for legal advice in course of patent prosecution	AC	1
773.	2/25/92	John Hynes	Jean Weidmeyer		Letter reflecting request for legal advice in course of patent prosecution	AC	1
774.	2/20/92	John Hynes	Philip Rittmueller		Letter reflecting request for legal advice in course of patent prosecution	AC	1
775.	2/14/92	Irene Abrams	John Hynes		Letter reflecting request for legal advice in course of patent prosecution	AC	1
776.					Produced in its entirety as Bates No. MIT 07124		1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
777.	2/28/03	Robert Swartz	Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
778.					Produced in its entirety as Bates No. MIT 07125		
779.	2/11/03	Robert Swartz	Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
780.					Produced in its entirety as Bates No. MIT 0712607128		
781.					Produced in its entirety as Bates No. MIT 07129-07132		
782.	9/22/05	Robert Fadel	Walter Bender	Nia Lewis Felice Gardner	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations; (post-suit email reflecting advice of outside counsel regarding discovery)	AC/WP	2
783.	2/23/04	Deb Cohen	Felice Gardner	Robert D. Fadel	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
784.	12/22/03	Deb Cohen	Walter Bender	Teresa Kratman Joseph Robens Robert D. Fadel	Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	WP	1
785.	1/28/04	John P. Callinan	Walter Bender		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations	NR	2
786.					Produced in its entirety as Bates No. MIT 07133		
787.					Produced in its entirety as Bates No. MIT 07134-07135		
788.					Produced in its entirety as Bates No. MIT 07136		
789.					Produced in its entirety as Bates No. MIT 07137		
790.					Produced in its entirety as Bates No. MIT 07138-07139		
791.	3/11/05	Robert D. Fadel	Geoff Wilson		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations.	WP	1
792.	3/8/05	Robert Swartz	Robert Fadel		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations.	WP	1

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NR = Non-Responsive

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
793.	3/11/05	Geoff Wilson	Robert D. Fadel		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations.	WP	2
794.					Produced in its entirety as Bates No. MIT 07140		
795.	3/11/05	Geoff Wilson	Robert D. Fadel		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations.	WP	1
796.	3/11/05	Robert D. Fadel	Geoff Wilson		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations.	WP	1
797.					Produced in its entirety as Bates No. MIT 07141		
798.	3/11/05	Geoff Wilson	Robert D. Fadel		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations.	WP	1
799.	3/11/05	Robert D. Fadel	Geoff Wilson		Email internal to MIT personnel prepared in anticipation of litigation in the context of license negotiations.	WP	1
800.	10/5/00	Robert Swartz	Bruce Bullock		Memorandum containing non-responsive information	NR	1

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 NR = Non-Responsive

ENTRY NO.	DATE	AUTHOR	RECIPIENTS	OTHER RECIPIENTS	DESCRIPTION	PRIV. ASSERTED	PAGES
801.	10/6/00	Robert Swartz	Bruce Bullock		Memorandum concerning prosecution activities and licensing in context of license negotiations in anticipation of litigation	AC/WP	1
802.	7/20/00	Robert Swartz	Bruce Bullock		Document containing non-responsive information	NR	3
803.	6/99	MIT TLO	MIT		Internal MIT document reflecting legal advice and attorney work product re: development and use of intellectual property in the context of patent prosecution and license negotiations	AC/WP	22